

| | | |
|--|---|--|
| Doc Number: 8-32 | Lead: MB – Chief Finance Officer | Last Full Review: February 2026 |
| Tick one of the below for review/changes made : Full review and changes made <input checked="" type="checkbox"/> (add changes summary to table below) Full review, no changes made <input type="checkbox"/> Changes made but no full review <input type="checkbox"/> (add changes summary to table below) | | Reviewer / Editor: Chief Finance Officer Changes Approved By: NB <hr/> Reviewed and edited in-line with the Beacon? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

Confidential Reporting (Whistleblowing) Policy

Document Change Details

| Date | Summary of Changes Made |
|----------|---|
| Jan 2024 | All P&Ps revert to version 01 as approval process & version control moved to Sharepoint. Version number no longer shown on the document |
| Nov 2024 | Amendments to update reference to C-Suite, Governance Assistant and change of Board Whistleblowing Lead |
| Feb 2026 | Addition of Southdown’s Freedom to Speak Up (FTSU) Guardian. Providing extra clarity on recording and monitoring. Reinforcing differences between whistleblowing, grievance and safeguarding. Addition of explicit reference to sexual harassment as protected disclosure under the Employment Rights Act 6 April 2026. |

1.0 WHAT IS WHISTLEBLOWING?

In this policy, 'Whistleblowing' means employees, contractors and voluntary workers reporting suspected misconduct, illegal acts or failure to act within Southdown.

Who can raise a concern under this Policy?

The Policy applies to all:

- employees of Southdown
- employees of contractors working for Southdown, for example, agency staff, builders and drivers
- employees of suppliers
- those providing services under a contract or other agreement with Southdown in their own premises, for example, care homes
- voluntary workers working with Southdown.

It is in the employee's interest to tell their manager as soon as possible if they have participated in an action causing concern. Southdown cannot promise not to act against such an employee, but the fact they came forward may be taken into account.

Clients or families of our CQC registered care and support living services can raise concerns either via our complaints process, or by contacting our Board Safeguarding and Whistleblowing Lead (see information below).

At Southdown we view 'Whistleblowing' as a positive act that can make a valuable contribution to the organisation's efficiency and long-term success. It is not disloyal to colleagues or Southdown to speak up.

We are committed to achieving the highest standards of service, of ethical standards in public life and all its practices.

You must read this Policy before raising a concern. It explains:

- the type of issues that can be raised
- how the person raising a concern will be protected from victimisation and harassment
- how to raise a concern
- what Southdown will do

If you are unsure whether to use this Policy or want independent advice, you may contact the independent charity Protect by telephone: 020 3117 2520 or by completing the form included on the following link, <https://protect-advice.org.uk/contact-protect-advice-line/>. Their advisers can give free confidential advice on how to raise a concern about serious malpractice at work.

2.0 WHAT IS THE AIM OF THE POLICY AND WHEN DOES IT APPLY?

Aims of the Policy

This Policy aims to:

- encourage people to feel confident in raising serious concerns and to question and act upon concerns
- provide ways to raise those concerns and receive feedback on action taken
- ensure a response to concerns and make people are aware of how to pursue them if not satisfied

- reassure whistleblowers that they will be protected from reprisals or victimisation having made a disclosure in good faith.

Nothing in Southdown agreements, policies, settlement terms or confidentiality clauses prevents, restricts or appears to restrict workers from making protected disclosures about sexual harassment or from reporting concerns to the Equality and Human Rights Commission (EHRC), ACAS, the police, or other prescribed persons. Where any wording could be interpreted otherwise, this statement prevails.

For clarity, whistleblowing concerns relate to matters of public interest or serious malpractice. Concerns about personal employment matters (such as working relationships, workload, or fairness issues) must be raised under the Grievance Procedure. Concerns relating to client abuse or risk must be raised under safeguarding procedures.

Scope of this Policy

The Whistleblowing Policy does not replace existing procedures:

- if the concern relates to the abuse or safety of a client or other vulnerable person, refer to the [Safeguarding Adults Policy \(4-04a\)](#) which take precedence; this Policy may still apply to the wider organisational risks identified.
- if the concern relates to an employee's treatment, they must raise it under the [Grievance Procedure \(8-29\)](#) or [Anti-Harassment and Anti-Bullying Procedure \(8-44\)](#).
- if a client has a concern about services provided to him/her, it must be raised as a complaint to Southdown
- Where the concern is raised in the public interest about sexual harassment occurring, likely to occur, or having occurred, it may also be raised (or cross-referred) under this Whistleblowing Policy and will be treated as a potential protected disclosure
- complaints of misconduct by Southdown employees are dealt with under our [Disciplinary Policy & Procedure \(8-27\)](#) (for further information please contact Southdown's Human Resources Advisor).
- The FTSU Guardian remains an independent, confidential route for staff to raise cultural, behavioural or safety concerns, including sexual harassment risk and prevention. (See contacts section.)

What should be reported?

Serious concerns about service provision or the conduct of officers or members of Southdown or others acting on behalf of Southdown that:

- make someone feel uncomfortable in terms of known standards
- are not in keeping with Southdown's values
- are not in keeping with Southdown's policies
- fall below established standards of practice
- are improper behaviour

These might relate to carrying out or facilitating:

- an offence or a breach of the law (a criminal offence or failing to comply with other legal obligation)
- disclosures related to miscarriages of justice
- racial, sexual, disability or other discrimination or harassment
- activities endangering the health and safety of the public and/or other employees
- damage to the environment
- unauthorised use of Southdown funds or other assets
- possible fraud, tax evasion or other financial corruption
- neglect or abuse of clients
- other unethical conduct

3.0 PROTECTING THE WHISTLEBLOWER

Legal rights

This policy takes account of the Public Interest Disclosure Act 1998 which protects workers making disclosures in accordance with the Act and in good faith, and makes it unlawful for Southdown to dismiss them or allow them to be victimised.

Harassment or victimisation

At Southdown we do not tolerate harassment or victimisation of a whistleblower (including informal pressures), and will take action to protect whistleblowers and treat harassment or victimisation as a serious disciplinary offence under [8-27 Disciplinary Policy & Procedure](#).

Southdown recognises the employer duty to take reasonable steps to prevent sexual harassment. This Policy supports that duty by providing safe reporting routes and committing to act on systemic risks identified through whistleblowing or FTSU concerns.

Support to whistleblowers

Throughout this process:

- whistleblowers must be given full support from the C-suite and Senior Management
- concerns must be taken seriously
- Southdown must do all it can to help whistleblowers throughout the investigation

If appropriate, we must consider temporarily re-deploying the whistleblower during the investigation.

For those who are not Southdown employees, we will endeavour to provide appropriate advice and support wherever possible.

Confidentiality

Concerns must be treated in confidence and the whistleblower's identity must not be revealed if that is their wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action without the whistleblower's help, in which case they may be asked to come forward as a witness. If they agree to, they must be offered advice and support.

Anonymous allegations

Staff, contractors, and volunteers are encouraged to put their name to allegations if possible. Without this, it is much more difficult for Southdown to protect their position or to give them feedback.

Anonymous allegations are much less powerful but may be considered at the discretion of Southdown.

Factors to be taken into account include:

- the seriousness of the issue raised
- the credibility of the concern
- the likelihood of confirming the allegation from other sources

Untrue allegations

If allegations are not serious, intend to do harm or are for personal gain, appropriate action, including disciplinary action, must be considered.

4.0 RAISING A CONCERN

Who should concerns be raised with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. Concerns should be raised with:

- Line manager of the person raising the concern, or
- A C-Suite member, or
- The Chief Executive

Concerns about the Chief Executive of Southdown must be raised with the Chair of the Board who will decide how the investigation will proceed. This may include external investigation. The Chair can be contacted in confidence at pauline.ford@southdown.org

Whistleblowing Lead

Southdown's Board has appointed Board Member, Graeme Allinson as its Whistleblowing Lead who can provide support for staff and clients to speak up when they feel unable to via other routes.

Southdown's Whistleblowing Lead will:

- treat any reports in the strictest of confidence
- be an impartial and independent representative
- listen sensitively and promote a positive culture
- provide feedback on the actions take; and
- use the opportunity to recommend improvements

Graeme Allinson can be contacted by email: graeme.allinson@southdown.org

Southdown's Freedom to Speak Up (FTSU) Guardian

Southdown's Freedom to Speak Up (FTSU) Guardian, Vince Ricot, Learning Development Business Partner. This role provides an additional, independent route for raising concerns and aligns with best practice guidance used within CQC-regulated services.

Southdown's FTSU Guardian will

- promotes a culture of openness;
- supports staff who feel unable to raise concerns via normal routes;
- triages concerns to ensure they are managed under the correct policy;
- provides assurance to the Board that serious concerns are responded to appropriately.

Vince Ricot can be contacted by email: vince.ricot@southdown.org

The Difference between Whistleblowing Lead and FTSU Guardian

The purpose of Whistleblowing Lead is to oversees the formal whistleblowing process, often linked to legal compliance under the Public Interest Disclosure Act (PIDA), whereas the purpose of the Freedom to Speak Up (FTSU) Guardian is to provide a confidential, supportive, independent route for staff to raise any concern - clinical, safety-related, cultural, behavioural, or organisational.

| Whistleblowing Lead | FTSU Guardian |
|--|--|
| Governance/compliance role | Independent, supportive, cultural role |
| Manages formal whistleblowing pathways | Helps staff speak up early and safely |
| Often for escalated or serious disclosures | Accessible to all staff |
| Focus on investigations and statutory duties | Focus on culture, learning, early help |

The Whistleblowing Lead and/or FTSU Guardian will be able to distinguish between:

- valid whistleblowing disclosures under this Policy;
- matters more appropriately addressed under the Grievance Procedure or Anti-Harassment and Anti-Bullying Procedure;
- matters that are safeguarding concerns and should be managed under the Safeguarding Adults or Safeguarding Children Policies.

The Chief Executive (or their delegate) is responsible for ensuring that the Whistleblowing Lead and FTSU Guardian receives appropriate guidance, support, and briefing on their responsibilities under this Policy, including identifying what constitutes a protected disclosure.

How to raise a concern

People can raise a concern by telephone, in person or in writing. The earlier it is raised, the easier it is to take action. The following information must be provided:

- the nature of the concern and why it is believed to be true
- the background and history of the concern (giving relevant dates)

Although not expected to prove beyond doubt the truth of the suspicion, whistleblowers must demonstrate they are acting in good faith and there are reasonable grounds for the concern.

People can invite trade union, professional association representatives or a friend for support during meetings or interviews about the concerns raised, and meetings can be arranged away from the workplace.

People can raise concerns about sexual harassment via:

- their line manager (where safe to do so),
- a C-Suite member,
- the FTSU Guardian,
- the Whistleblowing Lead, or
- directly under this Policy using the confidential contact routes listed.

Where the alleged harasser is within the management chain, workers are encouraged to use the FTSU or Whistleblowing Lead route. Southdown will ensure no detriment for raising concerns in good faith.

Key Contacts:

A full list of the C-Suite, Senior Management Team, and the Board Members is available on the Southdown website, <https://www.southdown.org/about-us/our-people/>.

Chair or the Board – Pauline Ford, pauline.ford@southdown.org

Safeguarding Lead – Anita Beverton, anita.beverton@southdown.org

Safeguarding Lead – Rah Bray, rah.bray@southdown.org

Whistleblowing Lead – Graeme Allison, graeme.allinson@southdown.org

Freedom to Speak Up (FTSU) Guardian – Vince Ricot, vince.ricot@southdown.org

Governance Assistant – Sara Hobden, sara.hobden@southdown.org

Address: Southdown Housing Association, 2 Bell Lane, Lewes, East Sussex, BN7 1JU.

Telephone number: [01273 405800](tel:01273405800)

Letters marked confidential can be sent to the Chair or the Board, Safeguarding Lead, Whistleblowing Lead, Freedom to Speak Up (FTSU) Guardian or Governance Assistant c/o Bell Lane which will be delivered unopened to them.

If unsure who to contact, the whistleblower may call the independent charity Protect tel: 020 3117 2520 for advice.

5.0 WHAT SOUTHDOWN WILL DO

Southdown must and will respond to concerns as quickly as possible.

The overriding principle for Southdown is public interest. In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries must be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out without informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases, however, such as allegations of ill treatment of others, suspension from work may have to be considered.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary/grievance process
- be referred to the police
- be referred to the external auditor
- be referred and put through established protection/abuse procedures
- form the subject of an independent inquiry

Within ten working days of a concern being raised, the person investigating the concern must write to the whistleblower:

- acknowledging the concern has been received
- indicating how Southdown proposes to deal with the matter
- supplying information on staff support mechanisms
- telling them whether further investigations will take place and if not, why not

The amount of contact between the whistleblower and the officers investigating must depend on the nature of the matters raised, the difficulties involved and the clarity of information. It is likely the whistleblower will be interviewed to ensure the disclosure is fully understood.

Southdown must do what it can to minimise difficulties experienced as a result of raising a concern. For instance, if the whistleblower is asked to give evidence in criminal or disciplinary proceedings, Southdown must arrange for them to receive appropriate advice and support.

Whistleblowers must be assured disclosures have been properly addressed and kept informed of the progress and outcome of investigation unless there are legal reasons why this cannot be done.

Acting on systemic risks identified

Where sexual-harassment-related disclosures identify patterns or risks, Southdown will take preventative, proportionate and documented steps, including (as applicable):

- Risk assessment(s) targeted to roles, locations, third-party interactions, lone working, work-related social events, travel and other higher-risk factors; and periodic review of their effectiveness.

- Policy and training measures (including manager training and refreshers) and clear reporting mechanisms (with anonymous routes where feasible).
- Third-party risk controls (e.g., signage, venue rules, escalation protocols with customers/clients/service users) proportionate to the risk profile.
- Monitoring and evaluation (e.g., staff surveys, exit interviews, trend analysis) with learning shared via governance routes.

6.0 THE RESPONSIBLE OFFICER

The Chief Executive retains overall responsibility for this Policy. The Chief Finance Officer (CFO) is the Policy Owner and is responsible for ensuring the Policy is implemented. The Chief Executive is responsible for ensuring the Board Whistleblowing Lead/FTSU Guardian receives appropriate support and briefing to carry out their responsibilities.

7.0 HOW THE MATTER CAN BE TAKEN FURTHER

If the whistleblower is not satisfied with action taken and it is felt right to take the matter outside Southdown, the following are Southdown's prescribed contacts:

In relation to Southdown as a registered provider of social housing - The Regulator of Social Housing (RSH)
 Tel: 0300 124 5225
 Email: enquiries@rsh.gov.uk

In relation to the provision of health and social care - The Care Quality Commission (CQC)
 Tel: 03000 616161
 Email: enquiries@cqc.org.uk

In relation to health and safety of staff, clients and the public related to Southdown's activities - The Health & Safety Executive (HSE)
 Tel: 0300 003 1647
 Online: <https://www.hse.gov.uk/contact/index.htm>

In relation to compliance with data protection law - The Information Commissioner (ICO)
 Tel: 0303 123 1113
 Online: <https://ico.org.uk/global/contact-us/contact-us-public/>

In relation to operation as a Co-operative and Community Benefit Society - The Financial Conduct Authority (FCA)
 Tel: 020 7066 9200
 Email: whistle@fca.org.uk

A public disclosure to anyone else could take whistleblowers outside the protection of the Public Interest Disclosure Act and of this Policy.

This Policy does not prevent those concerned from taking their own legal advice.

8.0 INDEPENDENT SUPPORT

For any Southdown employee, if you feel you would benefit from support, you can access advice and counselling through our Employee Assistance Programme. This service is provided by UK Healthcare, who are accredited members of the British Association for Counselling & Psychotherapy.

The helpline is available 24 hours a day, 7 days a week. You can contact the service by calling 0800 107 6585 and quoting reference "73006 UK Healthcare" (free from a landline).

9.0 REVIEW OF THE POLICY

Southdown will review this Policy annually.

10.0 CORPORATE RECORDING AND MONITORING

Southdown's Governance Assistant will maintain a corporate register containing concerns brought to the organisation's attention.

Officers allocated to investigate a concern must provide a report with sufficient details for the corporate register.

The Governance Assistant reviews the corporate register and assists in the production of an annual report for the C-suite and Audit and Risk Committee (where there have been any cases during a year).

An annual Whistleblowing and FTSU Report will be presented to the C-suite and the Audit and Risk Committee. This report will be prepared and coordinated by the Governance Assistant, under the direction of the Whistleblowing Lead and the Freedom to Speak Up (FTSU) Guardian. It will summarise themes, lessons learned, actions taken, and any areas of organisational risk or cultural insight.

The purpose of the annual report is assurance, transparency, and compliance with best practice expectations for CQC-regulated and housing association environments.