Whistleblowing Policy and Procedure

Introduction

Irwell Valley Homes (IVH) is committed to ensuring high standards of conduct in all that it does. It is important that colleagues know what to do if the encounter something that they think is wrong, illegal or endangers others within IVH or the wider public.

This policy applies to all workers as defined under the Public Interest Disclosure Act 1998, including employees, temporary workers, contractors, consultants, agency staff, volunteers, officeholders, and former IVH workers. IVH also commits to applying a broad, inclusive interpretation of 'worker' to ensure individuals feel safe to speak up

This policy and procedure sets out how individuals can raise any concerns that they have and explains how those concerns will be dealt with.

Aims and Objectives

This policy aims to:

- Encourage colleagues to speak out about wrongdoing and reassure them that IVH will support all those who do so.
- Ensure colleagues and others feel confident in raising concerns about conduct of others in IVH or the way IVH is run and empower them to question and act upon any issues they identify.
- Provide avenues for colleagues and others to raise concerns and receive feedback on any action taken.
- Allow colleagues or individuals to take the matter further if they are dissatisfied with our response.
- Offer protection for whistleblowing in good faith.
- We are committed to ensuring high standards of openness and accountability and we will enable colleagues to voice concerns in a responsible and effective manner.

Policy

What Is Whistleblowing?
Whistleblowing is the term used when someone who works within or for an organisation raises a concern about a possible fraud, crime, danger or other serious risk that could threaten customers, colleagues, the public or the organisation's own reputation. The matter can be raised in order that it may be investigated and if necessary corrected.

Responsibility to Prevent Wrongdoing
Everyone has a responsibility of preventing and eliminating wrongdoing at work.

Colleagues should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

Any matter raised under this policy will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the colleague who raised the issue where possible. The whistleblowing procedure should be followed when any concerns are raised to ensure that the matter is dealt with correctly.

Anonymous disclosures will be considered; however, they may be more difficult to investigate. Discretion lies with the Company Secretary to proceed with an anonymous concern which will depend on the seriousness and credibility of the information provided.

Qualifying Disclosures

The Public Interest Disclosure Act 1998 provides protection for workers who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that any of the below is being, has been or is likely to be committed:

- Criminal activity
- Failure to comply with any legal obligation or regulatory requirement
- Miscarriages of justice
- Danger to health and safety
- Damage to the environment
- Abuse or neglect of vulnerable people
- Bribery
- Financial fraud or mismanagement
- Breach of any other legal obligation
- Undisclosed conflicts of interest
- Negligence
- Harassment or discrimination
- Breaches of safeguarding or equality obligations
- Sexual harassment
- Unauthorised disclosure of confidential information
- The deliberate concealment of any of the above

It is not necessary to have proof that such an act is being, has been, or is likely to be, committed a reasonable belief is sufficient. It is the responsibility of the organisation, not the colleague, to ensure that an investigation takes place.

Expectations When Raising a Concern

A colleague disclosing their concerns:

- must believe that what they are disclosing is in the public interest;
- must believe what they are disclosing is substantially true;
- must not act maliciously or make false allegations; and
- must not seek personal gain.

Where possible, colleagues should try provide details such as:

- nature of the concern
- relevant background, dates and times
- individuals involved

- why you believe this is a protected disclosure
- any previous attempts to raise the issue
- any supporting evidence

Distinguishing Whistleblowing from Grievances

Making a disclosure (whistleblowing) should not be used to raise personal grievances. A whistleblowing concern is raised as a witness to wrongdoing affecting others or the organisation, whereas a grievance relates to an issue that affects the individual personally. Personal grievances should be raised internally through IVH's Grievance Procedure or the Bullying and Harassment Procedure, as set out in the Colleague Guides.

The following are not matters for the whistleblowing policy and should be raised under the appropriate internal procedures:

- Customer complaints
- Employment grievances (personal pay, terms and conditions, performance management)
- Bullying or harassment raised as a personal complaint

Legal Rights on Confidentiality Restrictions

The Employment Rights Act 2025 confirms that no confidentiality clause, NDA, settlement agreement or internal policy can prevent an individual from making a protected disclosure. *Any term that attempts to restrict a worker from reporting any qualifying disclosures is unenforceable.*

Protection from Detriment and Victimisation

IVH is committed to ensuring that no colleague is subjected to any detriment, harassment or victimisation as a result of raising a concern under this policy.

This includes protection against any negative impact on their employment, training, promotion opportunities or any other aspect of their working life as a result of making a legitimate disclosure. Victimising or retaliating against a colleague for raising a qualifying disclosure is a disciplinary offence and may result in personal liability for those involved.

IVH has a legal duty to take all reasonable steps to prevent the harassment, retaliation or victimisation of any individual who raises a whistleblowing concern. Detrimental treatment may include, but is not limited to, dismissal, disciplinary action, threats, exclusion, harassment, negative treatment or any other unfavourable behaviour connected to the disclosure.

If misconduct is identified during any investigation carried out under this policy, IVH's disciplinary and dismissal procedures will be applied alongside any appropriate external actions.

When Discouraged from Raising a Concern

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, colleagues should not agree to remain silent. They should report the matter to the Company Secretary (currently the Executive Director - Corporate Services). In the absence of this person, they should report the matter to the Chief Executive (or another member of the Strategic Leadership Team in the Chief Executive's absence).

Data Protection
When a colleague makes a disclosure, the Association will process any personal data collected in accordance with its Data Protection Policy. Data collected from the point at which the colleague reports the disclosure is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Performance Reporting

- This policy will be reviewed every two years, or sooner if required by statutory, regulatory, best practice, emerging developments, or circumstances arising from reviews of other IVH policies.

- A log of formal whistleblowing will be reported to Audit and Risk Committee quarterly and recorded on the Associations Public Register.

- Following each whistleblowing investigation, IVH will capture learning and insights to identify any process failures, procedural improvements, training requirements or organisational changes needed to reduce the likelihood of recurrence.

Roles and Responsibilities

- The Company Secretary (currently the Executive Director - Corporate Services) is the appointed person within IVH with responsibility for whistleblowing concerns and the person to whom colleagues should report whistleblowing concerns.

- The Chief Executive is responsible for considering reports of whistleblowing if these involve the Company Secretary.

- The Chair of Board is responsible for considering reports of whistleblowing where these involve the Chief Executive.

- It is the responsibility of all managers to report any whistleblowing concerns they are made aware of. Managers should not seek to investigate these concerns themselves.

- Managers will receive annual training to help them recognise protected disclosures, respond appropriately, escalate concerns promptly, and avoid behaviour that could amount to detriment.

Associated Documents and Good Practice

This policy should be read in conjunction with the following documents:

- Disciplinary and Dismissal Policy and Procedure
- Grievance Procedure
- Bullying and Harassment Procedure
- Safeguarding Policy and Procedure
- Modern Slavery Statement
- Colleague Guides

Further information about whistleblowing can be found here:

- https://www.gov.uk/whistleblowing

- https://www.gov.uk/government/publications/whistleblowing-guidance-and-code-of-practice-for-employers

Relevant legislation includes:
- Employment Rights Act 1996 (as amended by Public Interest Disclosure Act 1998)

Version Control

Approval Date:	23 March 2026
Approval Body	Governance & Remuneration Committee
Implementation Date:	23 March 2026
Policy Author:	Alison Horner - Head of Governance & Assurance
Policy Owner:	Sam Young - Executive Director - Corporate Services (Company Secretary)
Frequency of Review	Every 2 years or sooner depending on updates to legislation, good practice etc.
Planned Review Date	March 2028
EIA (Equality Impact Assessment) Date and Link to EIA	This policy applies to all individuals equally
Safeguarding Impact	This policy supports the safeguarding of individuals
Lead Team	People Team

The latest version of this policy should be viewed online from The Hub area of the IVH intranet, and any printed version cannot be relied on as the most current version

Procedure

1. Purpose of the Procedure

1.1 This procedure is in place to provide safeguards to enable colleagues to raise concerns about the conduct of others in the organisation or the way in which the organisation is run. The aim is to outline what colleagues should do when reporting perceived wrongdoing within IVH and to provide a rapid mechanism under which genuine concerns can be raised internally without fear of repercussions to the individual.

1.2 The procedure also seeks to balance the need to provide safeguards for colleagues who raise genuine concerns about malpractice against the need to protect other colleagues and the organisation against uninformed or vexatious allegations which can have serious consequences for innocent individuals.

1.3 We encourage all colleagues to raise their concerns under this procedure in the first instance. If a colleague is not sure whether to raise a concern, they should discuss the issue with the Company Secretary (currently the Executive Director - Corporate Services). In their absence, they should report the issue to the Chief Executive (or, in the Chief Executive's absence, another member of the Strategic Leadership Team).

1.4 This procedure is for disclosures about matters other than a breach of a colleague's own contract of employment. If a colleague is concerned that their contract has been, or is likely to be, breached, they should use IVH's grievance procedure. Colleagues can raise any queries regarding grievance allegations with the People Team.

2. Reporting and Investigation Process

2.1 In the first instance, any concerns should be raised with the Company Secretary, either verbally or in writing, or via the dedicated confidential Whistleblowing Mailbox: Whistleblowing@irwellvalley.co.uk. This mailbox is soley monitored by the Head of Governance and Assurance and the Head of People to ensure confidentiality is always maintained.

In the absence of the Company Secretary (or if the concerns implicate the Company Secretary in some way) they should report the matter to the Chief Executive (or, in the absence of the Chief Executive, another member of the Strategic Leadership Team).

2.2 The Company Secretary will arrange an investigation into the matter. They will either investigate the matter themselves (or nominate a member of the Senior Leadership Team) or pass the issue to the Chief Executive or Chair of Board, where the matter involves the Chief Executive.

2.3 The matter will be investigated thoroughly, promptly and confidentially, and, where possible, the outcome of the investigation reported back to the colleague who raised the issue.

2.4 The Company Secretary (or other investigating manager) will then report their findings and any recommendations to the Chief Executive (or Chair of Board where the matter involves the Chief Executive). In these instances, and in the instance of the Chief Executive conducting an investigation, the Chief Executive will then take any necessary action. This may include reporting the matter to any appropriate government department or regulatory agency. If disciplinary action is required, the Chief Executive will report the matter to the Head of People and start the disciplinary procedure.

2.5 Serious concerns involving significant loss, fraud or reputational risk will be escalated to the Executive Team, Chair of Audit & Risk Committee within 48 hours and Board will be notified. The Chief Executive will then take any necessary action.

2.6 On conclusion of any investigation, the colleague will be told the outcome of the investigation and what the Chief Executive has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

3. Escalation and External Bodies for Disclosures

3.1 If the colleague reasonably believes that appropriate action has not been taken, they can appeal the decision internally to the Chair of Audit and Risk Committee.

3.2 If after appealing internally the colleague is still not satisfied with the outcome, they can raise the issue with the appropriate external regulatory body. Legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs
- Financial Conduct Authority
- Regulator of Social Housing
- Health and Safety Executive
- Environment Agency
- Information Commissioners Office
- Equality and Human Right's Commission
- Care Quality Commission
- Serious Fraud Office
- HM Treasury

For more information: https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies

Colleagues may also consider reporting the matter to the following:

- If the problem involves a very senior member of staff – contact a Board Member
- In the case of a criminal offence – contact the Police
- In the case of abuse of vulnerable people in a residential home – contact the relevant Local Authority Social Services department
- In the case of abuse of public funds – contact the Regulator of Social Housing.
- In the case of fraud by the Association's external auditors – contact the Regulator of Social Housing.
- If colleagues feel uncomfortable reporting an incident internally, they may contact IVH's Internal Auditors. Independent advice is also available from Protect, the UK whistleblowing charity.

Please see Appendix I for external contact details.

The colleague may at any time disclose the matter to a professionally qualified lawyer for the purpose of taking legal advice.

The contacts outlined above should only be used in exceptional and urgent circumstances or where it has not been possible to bring the matter to the attention of IVH’s internal management.

External Contact Details:

Greater Manchester Police
Northampton Rd
Manchester
M40 5BP

Telephone: 101
www.gmp.police.uk

Regulator of Social Housing
Level 1 A
City Tower
Manchester
M1 1RG

Telephone: 0300 1234 500
Mail to: enquiries@rsh.gov.uk

Internal Auditors:
Forvis Mazars
1 St Peters Square
Manchester
M2 3DE

Telephone: 0161 238 9200
www.mazars.co.uk

External Auditors
Azets
Ship Canal House
98 King St
Manchester
M2 4WU

Telephone: 0161 2451000
www.azets.co.uk

Protect
The Green House
244-254 Cambridge Heath Road
London E2 9DA

Telephone: 020 3117 2520
www.protect-advice.org.uk