Whistleblowing Policy

platform housing group

Scope of Policy

This policy sets out how employees, board members, stakeholders, consultants, sub-contractors, partners and any other agencies (including agency workers and former employees) can raise any serious concerns they may have about any aspect of Platform Housing Group's (the Group) work on a confidential basis without any fear of reprisal. This policy should be read in conjunction with the Group's Codes of Conduct.

Applicability

The policy applies to all employees, board members, stakeholders, consultants, sub-contractors, partners and any other agencies of Platform Housing Group.

1. Policy Statement

1.1 The Group is committed to the highest standards of quality, probity, openness and accountability. The Group operates within the country's laws and regulations and expects all employees, board members, stakeholders, consultants, sub-contractors, partners and any other agency to do the same.

1.2 An individual or external body may wish to raise issues/concerns on a confidential basis and the Group guarantees that they may do so without fear of reprisal or victimisation, as long as any concerns are expressed in good faith, even if they are ultimately unfounded.

1.3 This policy is informed by the Public Interest Disclosure Act 1998, Equality Act 2010, and Employment Rights Act 2025, and reflects the Group's commitment to creating a safe environment in which individuals can raise concerns, including concerns relating to sexual harassment, without fear of detriment or retaliation.

2. Context

2.1 For the purpose of this policy, whistleblowing is defined as the act of an employee, board member, stakeholder, consultant, sub-contractor, partner or any other agency raising a concern about misconduct within the Group. It can also be defined as giving information about any illegal and/or underhand practices. Whistleblowing will usually have an element of public interest in it, which would distinguish it from a grievance to be raised under the group's Grievance Policy.

Examples of misconduct or illegal practices may fall into one or more of the following categories (although the list is not exhaustive):

- Fraud, corruption and malpractice, or criminal activity.
- Failure to adhere to safe working practices.
- Abuse or neglect of vulnerable people, including children or young people or a vulnerable adult.

- Failure to deliver proper standards of service.
- Bullying, discrimination or victimisation in the workplace (see also Group Grievance Policy and Dignity at Work Policy).
- Breaches of the Group's policies, procedures, rules and regulations (e.g., failure to disclose a conflict of interest).
- Failure to comply with a legal obligation.
- Damage to the environment.
- Sexual harassment, sexual misconduct or a culture of sexually inappropriate behaviour, particularly where there is a risk to employees, customers, residents, service users, or the public, or where the concern is in the public interest.
- Failure to comply with, or a breach of, the Regulatory Framework for the social housing sector, the NHF Excellence in Standards of Conduct guidelines or the Group Code of Conduct.
- Deliberate concealment and/or distortion of information relating to any of the above.

2.2 Concerns relating to sexual harassment may be raised under this policy where the disclosure is made in the public interest, involves systemic issues, repeat behaviour, safeguarding risks, abuse of power, or a failure by the organisation to prevent or address harassment.

Individual complaints of sexual harassment that do not meet the public interest test may instead be addressed under the Group's Dignity at Work or Grievance policies.

3. Legal Requirements

3.1 The Group provides statutory protection, in line with the Public Interest Disclosure Act 1998, the Equality Act 2010, and the Employment Rights Act 2025, to individuals who make protected disclosures in good faith. This includes protection from dismissal, detriment, discrimination, or victimisation as a result of raising concerns, including disclosures relating to sexual harassment.

4. Reporting of Concerns

4.1 The Group is aware that it is never easy to report a concern, particularly one which may relate to fraud or corruption, and especially where the concern relates to a colleague (or colleagues), an employee's own line manager, or another senior employee. The Group strongly urges anyone with a serious concern to report the matter at an early stage and before any problem becomes more serious.

4.2 Specifically, all employees are required to raise their concerns immediately if they become aware of:

- The breaking or proposed breaking of any law or regulation by an employee at the Group.

- Group procedure or policy being deliberately broken.
- Any serious wrongdoing (in line with examples given at 2.1).
- Any matter which may lead to the harm of an employee, tenant, customer, member of the public, contractor, the environment.
- Any possibility or suggestion that one of the above has occurred and is being covered up.

4.3 The Group will do everything it can to respect confidentiality and anonymity if an individual requests it, though there may be instances when anonymity cannot be guaranteed (e.g., if a concern led to police enquiries and a prosecution of the alleged offender(s), and the whistleblower may be required to give evidence in Court).

4.4 The Group will take all reasonable steps to support concerned employees who report a concern in good faith and ensure so far as is reasonably practicable that they do not suffer intimidation in the workplace. The career of the person reporting a concern will also not suffer any harm or hindrance, neither will a person who is subject to whistleblowing and subsequently no case found against him/her.

4.5 The Group may take disciplinary action against any employee who tries to discourage another or others from reporting a genuine concern; the same approach will be taken with any employee who criticises or victimises an employee who has reported a concern or against an employee who makes a vexatious claim of whistleblowing.

4.6 Any employee who is found to have maliciously raised an allegation will be subject to the Group's Disciplinary Policy and Procedure. An employee who fails to raise a concern when reasonably aware or certain of an occurrence outlined in clause 4.2, may be regarded with as an accessory and action may be taken against them under the Group's Disciplinary Policy and Procedure.

5. The Whistleblowing Process

5.1 Employees who wish to raise concerns should contact the Group Chief Executive (kevin.bolt@platformhg.com) making it clear that they are reporting the concern under the Whistleblowing Policy, including the following:

- What the alleged concern relates to
- Who this relates to
- Any supporting information if available

If the concern is about the Group Chief Executive then they should contact the Chief People and Excellence Officer (clare.durnin@platformhg.com or tel. 07554 401430) or the Director of Governance and Excellence (andrew.bush@platformhg.com or tel. 07791 634798).

In the event the colleague wishes to raise a concern with someone independent of the Group's management structure this can be raised with the Chair of the Group Audit and Risk Committee (ian.ailles@platformhg.com).

Where a whistleblowing disclosure relates to sexual harassment or sexual misconduct, the Group will ensure that the concern is handled sensitively, confidentially, and, where appropriate, by individuals independent of any alleged perpetrators.

6. What Happens After a Concern is Reported

6.1 All concerns raised under the terms of the Whistleblowing Policy will be confidentially referred to the Group Chair and Group Audit and Risk Committee Chair immediately (unless he/she is connected to the concern). The Group Chief Executive will inform the Executive Team of any allegations raised as necessary and appropriate.

6.2 In the event that the Group Chief Executive is involved in any allegations under the Whistleblowing Policy, the Group Chair and Group Audit and Risk Committee Chair will be informed and consultation shall take place with other board members as appropriate.

6.3 It is the responsibility of the Group Chair to inform Board Directors of any allegations made under the Whistleblowing Policy.

6.4 The Director of Governance and Excellence will oversee the investigation of any disclosures raised as appropriate. The investigation will be carried out by someone independent of the parties concerned and, if necessary, an external investigator will be appointed. The individual raising the whistleblowing concern will be notified of the following:

- Who is handling the matter and how they can make contact.
- Provide an estimation of how long the investigation will take.
- Advise on what to do if you or anyone else raising the issue suffers from immediate or subsequent detrimental action.
- Commit to giving feedback after the matter has been concluded if possible.

6.5 If a significant breach of legal or regulatory requirements is alleged, the Regulator for Social Housing (or other appropriate regulator e.g., the Charity Commission, Building Safety Regulator) will be informed.

6.6 The Group understands that there is a need to be fair to the individual reporting the concern, but that no action will be taken against any other party involved until the investigation is completed.

6.7 The result of any investigation will be considered by the Group Audit and Risk Committee, together with the action to be taken to rectify the position and to avoid any recurrence. Where the Regulator of Social Housing, or other appropriate regulator, has not been involved in the investigation, and the investigation concludes that a significant breach of legal or regulatory requirements has occurred or is likely to have occurred, the Group will notify them at the earliest opportunity.

6.8 Once the matter has been concluded, the Group Chief Executive (or Chief People and Excellence Officer/Director of Governance and Excellence as appropriate) will notify the individual who had raised the concern that this is the case. Dependent upon the circumstances and confidential nature of the situation, the individual may not be advised of the detail of the outcome of the investigation.

7. Equality and Diversity

7.1 We are committed to fairness and equality for all regardless of colour, race, ethnicity, nationality, gender, sexual orientation, marital status, disability, age, religion or belief, family circumstances or offending history, as referred to in our relevant Group policies. Our aim is to ensure that our policies and procedures do not create an unfair disadvantage for anyone, either directly or indirectly.

8. Monitoring and Review

8.1 This policy will be reviewed every three years or in line with changes to legislation or best practice, whichever is earlier.

8.2 Approved documents are valid for use after their approval date and remain in force beyond any expiry of their review date until an updated version is available.

9. Associated Documents

9.1 List of documents - associated policies, procedures and publications:

- Anti-Fraud, Bribery and Corruption Policy
- Code of Conduct for Board and Committee Members and Involved Residents
- Employee Code of Conduct
- Data Protection Policy
- Dignity at Work Policy
- Disciplinary Policy and Procedure
- Grievance Policy and Procedure
- Probity Policy
- NHF Excellence in Standards of Conduct

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