SP15 Confidential Reporting (Whistleblowing) Policy

1. Scope

This policy sets out Soha's commitment to its employees and others associated with the organisation who have serious concerns about its business activities and who may need to come forward on a confidential basis. This includes concerns or suspicions about individual employees, managers, contractors or working practices. Soha has separate policies and procedures for the resolution of grievances, disciplinary matters and concerns about equality, diversity and inclusion. If none of these are appropriate, the Confidential Reporting (Whistleblowing) Policy may be used.

It applies to the Soha Group including Soha Housing Ltd, SIB Property Ltd and Soha Response Ltd and should be read in conjunction with Soha's Code of Conduct.

2. Aim

Soha aims to have the highest standards of probity, openness, transparency, accountability and quality. As part of that commitment, we encourage employees or others with serious concerns to come forward, express those concerns and be supported in doing so.

This policy aims to:

- encourage staff, contractors, involved residents or Board members to raise concerns
- not tolerate reckless, inappropriate or illegal acts
- take seriously any genuine concerns raised in good faith and investigate them
- demonstrate a culture of transparency, openness and accountability while treating individuals fairly and respecting confidentiality
- support and protect the person who has raised a genuine concern from reprisals or victimisation
- not tolerate malicious allegations
- learn lessons

We recognise that without clear and safe guidance, whistleblowing can easily have damaging consequences, both for the individual concerned and the Soha Group. An effective policy will ensure that serious concerns are properly raised and addressed in a timely way.

3. Policy Statement

Whistleblowing is the raising of a concern or reasonable belief about a danger, risk, malpractice or wrongdoing that could threaten residents, employees, the public, or the Group's reputation.

Examples include the following but are not limited to:

- criminal offences
- failure to comply with legal obligations
- miscarriages of justice
- fraud, corruption, money laundering, breach of contract
- offering, taking or soliciting bribes

- the health and safety of any individual
- neglect of vulnerable residents and safeguarding concerns that are not acted upon appropriately
- misreporting key performance data
- damage to the environment
- unethical conduct and the deliberate concealment of any of the above

Whistleblowing does not cover personal matters which may include:

- where an employee or Board member feels bullied, aggrieved, harassed, victimised or subjected to discrimination
- expressions of dissatisfaction about the standard of service, actions, or lack of actions by the Soha Group, its own staff or those acting on its behalf; these should be raised using the Complaints Policy

4. When to raise a concern

It is not necessary to have proof that an act is being, has been or is likely to be committed – a reasonable belief is sufficient.

In deciding whether a suspicion or concern needs reporting under this code, individuals should consider whether the matter feels uncomfortable, awkward or unnerving; whether it constitutes a breach of accepted standards of conduct or the values of the Group and whether it appears to breach rules, procedures or normal practice.

Anyone disclosing 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.

If a Board member has concerns about the Board or the Group that cannot be resolved, these concerns will be shared with the Board and formally recorded.

5. How to raise a concern

In most cases individuals should be able to raise any concerns with their line manager depending on the severity and sensitivity of the issues and who may be involved. If this is not possible, they should speak to the Chief Executive or a member of SLT and ask for a confidential meeting. Where the Chief Executive may be involved in the problem, they can contact the Senior Independent Director (on the Group Board) directly to discuss the issues. Where you request confidentiality, this will be respected as far as possible.

Matters raised under this policy will be investigated thoroughly, promptly and confidentially. Any individual raising a concern has a responsibility to keep their whistleblowing confidential and not to tell others, including colleagues, that a report has taken place. Failure to maintain confidentiality could compromise any investigation and the Group's ability to take corrective action.

The outcome of the investigation and any proposed action may be reported back to the individual(s) who raised the issue, if requested. However, in doing so, it may be necessary to consider and respect the confidentiality of others and, consequently, there may be operational or data protection issues which prevent or limit the extent to which this information can be disclosed.

6. Anonymous allegations

Soha encourages individuals to put their name to the report whenever possible as anonymous concerns are more difficult to investigate. We are also unable to support or protect anonymous whistleblowers. We will carry out an initial investigation of anonymous concerns where practical.

7. Malicious allegations

Employees or Board members who are found to have reported a concern maliciously and not in good faith could face a disciplinary process and possible dismissal.

8. Your rights and how to take the matter further

The Employment Rights Act 1996, as amended by the Public Interest Disclosures Act 1998, gives protection to employees to voice authentic concerns about misconduct and malpractice without receiving penalties such as dismissal, victimisation, or denial of promotion, facilities or training opportunities.

This policy is intended to provide individuals with a route within the Group to raise concerns to reach a satisfactory outcome. If this is not possible and they feel it is right to take the matter outside of the Group, concerns may be raised with the Regulator of Social Housing in relation to any regulatory issues at:

Referrals and Regulatory Enquiries team
Regulator of Social Housing
Level 2, 7-8 Wellington Place
Leeds
LS1 4AP
Email: enquiries@rsh.gov.uk
Tel: 0300 124 5225

'Protect' offer a dedicated advice line 020 3117 2520 staffed by qualified and independent lawyers. The helpline is an additional method of dealing with whistleblowing concerns and it aims to provide confidential support and advice to employees who feel they are not able to raise a concern directly. Protect has a number of frequently asked questions on their website: **Protect - Speak up stop harm (protect-advice.org.uk)**

Raising concerns with the media, or through social media, is considered a disciplinary matter and may leave an employee or Board member liable to disciplinary action including dismissal/termination of their contract.

9. Resident Involvement

Resident consultation has not been carried out for this policy as it is mainly aimed at employees and Board members. However, involved residents will be provided with a copy for information alongside Soha's Code of Conduct.

10. Responsibility

The Chief Executive has overall responsibility for the effective implementation of this policy. However, it is the responsibility of all employees, Board members and involved residents to report danger, risk, malpractice or wrongdoing that could threaten residents, employees, the public, or the Group's reputation.

11. Monitoring and review

The Personnel and Remuneration Committee will receive reports on any occurrences of whistleblowing made within the Soha Group. When issues cannot be resolved, the Board will be informed.

This policy will be reviewed every three years or sooner in line with changes to law, legislation or regulation.

12. Context

Soha's Code of Conduct 2026
NHF Code of Conduct 2026
RSH Competence and Conduct Standard 2026
SP01 Equality, Diversity and Inclusion Policy
SP09 Gifts, Hospitality and Register of Interests Policy
SP16 Anti Bribery and Anti-Fraud Policy
HR17 Competence and Conduct Policy
Soha's Financial Regulations

Members' Forum (for information)	16 May 2024	SLT Approved SLT Approved (minor amendments)	1 May 2024 27 October 2026
P&R Committee Approved	8 May 2024	Board Approved	23 May 2024
EIA Completed	27 March 2024	Review Due Date	By May 2027
DPIA Checklist Completed	27 March 2024		