"Offering our community more than a home"

Whistleblowing Policy

SMT Review date:	March 2026
Previous Approval:	November 2020
Management Committee submission:	April 2026
Next Review date:	March 2029 (or when new guidance received)

CHA Objectives:

- To ensure that our resources are adequate to deliver our objectives by investing in our people, increasing digitalisation, demonstrating value for money and through robust procurement practices.
- To manage the houses provided, in a professional and cost-effective manner, for the benefit of our local community and the environment.
- To promote social inclusion by applying principles of equality and diversity to everything we do.

Regulatory Standards:

- The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.
- The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these objectives.
- The RSL manages its resources to ensure its financial well-being and economic effectiveness.
- The RSL conducts its affairs with honesty and integrity.
- The governing body and senior officers have the skills and knowledge they need to be effective.

Any breach or non-compliance with legislation/regulatory requirements in relation to this Policy constitutes a Notifiable Event and the Regulator will be informed via the SHR Portal.

If you have difficulty with reading this policy, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.

Clydebank Housing Association Limited
Whistleblowing Policy

Introduction

Clydebank Housing Association (CHA) is committed to the highest standards of openness, probity and accountability. As employees are often the first to realise that there may be something seriously wrong, CHA would encourage and expect employees who have serious concerns about any aspect of CHA's work to come forward and speak up without fear of reprisal. Therefore, CHA recognises that it is an important aspect of accountability and transparency to provide a mechanism to ensure that no employee of CHA feels at a disadvantage in raising legitimate concerns.

The Public Interest Disclosure Act (1998) gives legal protection to employees against being dismissed or penalised by their employers as a result of making a protected disclosure (whistleblowing). Concerns which are raised through whistleblowing must be made in the 'public interest' which means that the concerns must affect others such as the public or other stakeholders.

Concerns which are not in the public interest will normally be dealt with through the grievance policy. If you are unsure which policy is appropriate to raise your concerns, please contact your line manager to discuss.

All employees and workers are covered by this policy.

Scope of Policy

This policy is designed to enable employees to raise concerns internally at a senior level to disclose information that the individual believes shows malpractice or impropriety. This policy is intended to cover concerns that are in the public interest and may (at least initially) be investigated separately but may lead to the instigation of other procedures. These concerns might include:

- Financial malpractice, impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to health and safety or the environment
- Criminal activity involving CHA, its staff, committee/board member or stakeholders
- Professional malpractice
- Improper conduct or unethical behaviour
- Failure to meet legal obligations
- Abuse of power or status
- Deliberate attempts to conceal any of the above

Legal Framework

- Public Interest Disclosure Act 1998
- Enterprise & Regulatory Act 2013

Safeguards

Protection

This policy is designed to offer protection to employees who disclose serious concerns provided the disclosure is made:

- In the public interest.
- To an appropriate person/body.
- That the individual has reasonable belief in the validity of the concerns being raised.

CHA will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect the individual when they raise a concern which complies with the above points.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal the individual's identity if they so wish. However, at the appropriate time the individual may need to come forward as a witness. If we need to disclose your identify to anyone, we will ensure that you are notified of this in advance.

Anonymous Allegations

This policy encourages individuals to put their names to any disclosures they make. Concerns expressed anonymously are more difficult to investigate, however they may be considered at the discretion of CHA.

Untrue Allegations

If an individual makes an allegation that is not confirmed by the subsequent investigation, it is probable that no action will be taken against them. However, if the individual makes an allegation that is deemed to be made in 'bad faith' i.e. frivolously, maliciously or for personal gain, disciplinary action may be taken against them and this may be up to and including dismissal.

Raising a Concern

First Step

The individual should raise concerns with their immediate line manager. This information will be passed on as soon possible to the Chief Executive.

Any complaints will be investigated by the Chief Executive unless the complaint is against the Chief Executive or is in any way related to their actions. Where the complaint is related to the Chief Executive it should be addressed to the Chairperson of the Governing Body/Management Committee who will in turn appoint an independent person to investigate the allegations.

Although the individual is not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate that there are reasonable grounds for their concern.

The earlier the individual expresses their concern, the easier it is to action. The amount of contact between the persons considering the issues and the individual will depend on the nature of the matters raised, the potential

difficulties involved and the clarity of the information provided. If necessary, CHA will seek further information from the individual concerned.

Where any meeting is arranged with the individual that raised the concerns, they can be accompanied by a trade union representative and the meeting can be held off-site if they so wish.

Process
On receipt of a disclosure the following process will be followed:

- The disclosure will be considered, and, if appropriate, a meeting will be arranged with the individual who raised the concerns to gather initial information.
- Further to this meeting, if appropriate, an independent investigator will be appointed to take forward an investigation into the concerns raised.
- The individual who raised the concerns will be provided with an update and a likely timescale on when they will receive a final response.
- Once the investigation is complete a report will be provided to the individual who instructed the investigation.
- The report will be considered, and appropriate actions will be taken.
- A final outcome will be provided to the individual who raised the concerns.

Depending on the outcome of the investigation, appropriate action will be considered in accordance with CHA's existing policies and procedures.

Outcomes of Investigations

Once the investigation has been completed and the report is received by the Chairperson, a decision on what action to take will be considered. If there are reasonable grounds to substantiate the complaint, an appropriate procedure will be initiated. This may also include referral to an external body or regulator (e.g. Scottish Housing Regulator/OSCR).

Right of Appeal

Where an individual feels that their concern has not been dealt with appropriately they can appeal the decision internally to the Vice Chair of the Finance, Audit & Risk Sub-Committee (who should not be an office bearer).

Raising a Concern Externally

CHA encourages employees to raise concerns internally to allow for appropriate investigation and action to be taken, however if an employee remains dissatisfied with the outcome they can raise this with the correct prescribed body or person.

General Data Protection Regulations (GDPR):

The organisation will treat your personal data in line with our obligations under the current data protection regulations and our own Policies. Information regarding how your data will be used and the basis for processing your data is provided in CHA's employee privacy notice.

This policy does not form part of your contract of employment, therefore may be updated or withdrawn at any time. If this happens it will be communicated to you accordingly.

Equality and Human Rights

We will not discriminate on the grounds of Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, and Sexual Orientation. An Equality Impact Assessment has been carried out and none of these protected groups will be unduly affected by this Policy. The Policy applies to all.

The Association will provide equality of opportunity and fair treatment for all, ensuring that no individual or group is treated less favourably than anyone else. We work closely with community stakeholders, to provide assurance that we are achieving these aims.

The Association will meet, and where appropriate exceed our obligations under the Equality Act 2010, including the general equality duty in the Act, to ensure we do not discriminate against, harass or victimise a person because they have one or more of the nine protected characteristics described in the Act.

An Equality Impact Assessment has been carried out as part of the review of this policy, in order to assess where the aims of this policy may have a positive, negative or neutral impact upon any of the nine Protected Characteristics set out in the Equality Act 2010.

Review

CHA undertakes to review this policy regularly, at least every three years after the initial first year review, with regard to:

- Applicable legislation, rules, regulations and guidance
- Changes in the organisation
- Continued best practice

For Office Use Only – Required Actions

Customer Consultation Required/Arranged	No
Intranet Update	Yes
F Drive Update	Yes
Website Update	Yes
Leaflet change required?	No
Newsletter Promotion?	No
Other information updated, e.g. posters, automatic email responses, post cards, answering machine messages, etc.	No
Equality Impact Assessment completed and attached	Yes

Appendix 1

List of Prescribed Persons

1. Scottish Housing Regulator
The Scottish Housing Regulator
5th Floor, 220 High Street
Glasgow G4 0QW
Phone: 0141 242 5642

Email: shr@shr.gov.scot

2. West Dunbartonshire Environmental Health Department
Environmental Health Section
16 Church Street,
Dumbarton
G82 1QL.
Phone: 0141 951 7957

Email environmental.health@west-dunbarton.gov.uk

Report an issue online: Report an Environmental Health Issue

3. Health and Safety Executive (HSE)
1 Atlantic Square
21 York Street
Glasgow
G2 8HS
Phone: 0300 003 1747 (Mon-Fri, 8:30am–5pm, Wed 10am–5pm)

Report urgent, major, or fatal incidents via the Incident Contact Centre at 0345 300 9923

On-line form https://www.hse.gov.uk/contact/tell-us-about-a-health-and-safety-issue.htm

Further Sources of Information

ACAS Helpline 0300 123 1100

Unite the Union 0141 404 5424

GMB Trade Union 0141 332 8641

Clydebank Housing Association
Equality Impact Assessment Tool

The Equality Impact Assessment process aims to prevent discrimination against people who are categorised as being disadvantaged or vulnerable within society (as listed in point 4).

Name of the **policy / proposal** to be assessed	Whistleblowing	Is this a **new policy / proposal or a revision**?	Revision
Person(s) responsible for the assessment	Lynette Lees		

1. Briefly describe the **aims, objectives and purpose** of the policy / proposal	This policy is designed to enable employees to raise concerns internally at a senior level to disclose information that the individual believes shows malpractice or impropriety. This policy is intended to cover concerns that are in the public interest and may (at least initially) be investigated separately but may lead to the instigation of other procedures.
2. Who is intended to benefit from the policy / proposal? *(e.g. applicants, tenants, staff, contractors)*	All employees and workers are covered by this policy.
3. What **outcomes** are **wanted** from this policy / proposal ? *(e.g. the benefits to customers)*	Ability for concerns of financial malpractice, impropriety or fraud, failure to comply with legal obligations, dangers to health and safety, etc., to be raised without repercussion or victimisation.

4. Which **protected characteristics** could be **affected** by the proposal? (*tick all that apply*)

Minority Ethnic	Gender	Disability	☐ Sexual Orientation	☐ Age	☐ Religion	☐ Transgender /Transsexual	☐ Marriage /Civil Partnership	☐ Pregnancy /Maternity

5. If the policy / proposal is not relevant to any of the **protected characteristics** listed in part 4, state why and end the process here.

Applicable to all – no particular group will be adversely affected by this Policy

	Positive impact(s)	**Negative impact(s)**
6. Describe the **likely positive or negative impact(s)** the policy / proposal could have on the groups identified in part 4		
7. What **actions** are **required** to address the impacts arising from this assessment? *(This might include; collecting additional data, putting monitoring in place, specific actions to mitigate negative impacts).*		

Signed: Lynette Lees (Job title): Chief Executive

Date the Equality Impact Assessment was completed: 26.03.2026

Please attach the completed document as an appendix to your policy / proposal report