

Title of POL: Whistleblowing Policy

Custodian: Chief People Officer

Version Number: 05

Issue date: 25.07.25

Review date: 25.07.28

**POLICY (POL)**

Title of Policy	Whistleblowing		
What type of document is this?	Policy (POL)	Policy Reference Number	HHH-POL-019
Purpose of POL	<p>We are committed to conducting our business with honesty and integrity, and we expect all colleagues to maintain our high standards. However, all organisations face the risk of things going wrong from time to time. A culture of openness and accountability is essential in order to prevent such situations from occurring and to address them when they occur.</p> <p>The aims of this policy are:</p> <ul style="list-style-type: none"><li>• Helping Hands encourage colleagues to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.</li><li>• To provide guidance as to how to raise those concerns.</li><li>• To reassure colleagues that they should be able to raise genuine concerns without fear of reprisal, even if they turn out to be mistaken.</li></ul> <p>This policy covers all employees, consultants, contractors, casual workers and agency workers.</p> <p>This policy does not form part of any employee's contract of employment, and we may amend it at any time.</p>		
<b>ROLES AND RESPONSIBILITIES</b> Include in this section details of the key roles and associated responsibilities relevant to the document			

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Roles	Responsibility
Chief People Officer	Is responsible for reviewing and updating this policy and ensuring that the policy is communicated across the company through the Senior Management Team(s)
Helping Hands Managers	Is responsible for implementing and embedding this policy within all teams across the company
Helping Hands Employees	Is responsible for adhering to this policy as directed by line managers

**1.0 Confidentiality**

- 1.1 We hope that colleagues will feel able to voice whistleblowing concerns openly under this policy. However, if they want to raise their concerns confidentially, we will make every effort to keep their identity secret. If it is necessary for anyone investigating the concern to know their identity, we will discuss this with them.

We do not encourage colleagues to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from them. It is also more difficult to establish whether any allegations are credible.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to The People Team or their line manager (if appropriate). If a colleague is in any doubt, you can seek advice from our confidential counselling hotline or protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

**2.0 Your Legal Right**

- 2.1 This policy has been written to take account of the Public Interest Disclosure Act 1998 which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Acts provisions and in the public interest.

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The Act makes it unlawful for the Company to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. The Company cannot promise not to act against such an employee, but the fact that they came forward may be considered.

### 3.0 What is Whistleblowing

3.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- 3.1.1 criminal activity;
- 3.1.2 failure to comply with any legal obligation;
- 3.1.3 miscarriages of justice;
- 3.1.4 danger to health and safety;
- 3.1.5 damage to the environment;
- 3.1.6 the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

If you are uncertain whether something is within the scope of this policy, you should seek advice from The People Team.

### 4.0 Raising a Whistleblowing Concern

4.1 We hope that in many cases colleagues will be able to raise any concerns with their Line Manager. They may tell them in person or put the matter in writing if they prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to The People Team.

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However, where the matter is more serious, or a colleague feels that their Line Manager has not addressed their concern, or they prefer not to raise it with them for any reason, they should contact one of the following:

- 4.1.1 Our confidential telephone hotline 08455 436527
- 4.1.2 Our confidential e-mail address: [SpeakUp@helpinghands.co.uk](mailto:SpeakUp@helpinghands.co.uk)
- 4.1.3 Whistleblowing Officer – [Karyn.mackenzie@helpinghands.co.uk](mailto:Karyn.mackenzie@helpinghands.co.uk)

## 5.0 Investigation Procedure

5.1 We will arrange a meeting with the individual as soon as possible to discuss their concern(s). They may bring a colleague or union representative to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

We will take down a written summary of concern and provide a copy after the meeting. We will also aim to give the individual an indication of how we propose to deal with the matter.

Once a concern has been raised, we will carry out an initial assessment to determine the scope of any investigation. We will inform the individual of the outcome of our assessment. They may be required to attend additional meetings to provide further information.

In some cases, we may appoint an investigator or team of investigators including an employee with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep the individual informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving specific details of the investigation or any disciplinary action taken as a result. Colleagues should treat any information about the investigation as confidential.

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If we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

## **6.0 If you are not satisfied**

6.1 While we cannot always guarantee the outcome an individual is seeking, we will try to deal with any concern fairly and in an appropriate way. By using this policy, colleagues can help us to achieve this.

If an individual is not happy with the way in which their concern has been handled, they can raise it with one of the other key contacts. Alternatively, they may contact our external regulators. Contact details are set out at the end of this policy.

## **7.0 Right to be Accompanied**

7.1 Colleagues are entitled to bring a companion to any formal meeting under this procedure. The companion may be either a trade union representative or a colleague. Colleagues must tell the person chairing the meeting who the chosen companion is, in good time before the meeting.

At the meeting, the companion may make representations to us and ask questions but should not answer questions on the behalf of the whistleblower. they may talk privately with them at any time during the meeting.

It is the whistleblowers responsibility to arrange for the companion to attend. Acting as a companion is voluntary and colleagues are under no obligation to do so. If they agree to do so they will be allowed reasonable time off from duties without loss of pay to act as a companion.

If the chosen companion is unavailable at the time a meeting is scheduled and will not be available for more than seven calendar days afterwards, we may ask the whistle-blower to choose someone else.

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We reserve the right to refuse or request an alternate companion where we feel that their presence may impede the procedure.

## 8.0 External Disclosures

8.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases it should not be necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for the whistle-blower to report their concerns to an external body such as a regulator. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concerns.

Whistleblowing concerns usually relate to the conduct of an employee, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. However, we encourage colleagues to report such concerns internally first.

## 9.0 Protection and Support for Whistleblowers

9.1 It is understandable that Whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment because of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an individual believes that they have suffered any such treatment, they should inform The People Team immediately. If the matter is not remedied, they should raise it formally using our Grievance Procedure.

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Individuals must not threaten or retaliate against Whistleblowers in any way. If anyone is involved in such conduct, they may be subject to disciplinary action.

A confidential support and counselling hotline is available to Whistleblowers who raise concerns under this policy. Their contact details are set out below.

**10.0 Key Contacts**

<b>CareFirst Lifestyle</b> (confidential counselling)	Helpline: 0808 168 2143 Online portal – <a href="http://www.carefirst-lifestyle.co.uk">www.carefirst-lifestyle.co.uk</a> :- Username: HH Password: employee
<b>Protect</b> (Independent whistleblowing charity)	Helpline: 0203 117 2520 E-mail: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a> Website: <a href="http://www.pcaw.co.uk">www.pcaw.co.uk</a>
<b>Care Quality Commission</b> (CQC -Regulator England)	Tel: 0300 061 6161 Email: <a href="mailto:enquiries@cqc.org.uk">enquiries@cqc.org.uk</a> Website: <a href="http://www.cqc.org.uk/GiveFeedback">www.cqc.org.uk/GiveFeedback</a>
<b>Care Inspectorate Wales</b> (CIW – Regulator for Wales)	Tel: 0300 7900 126 – Option 2 Email: <a href="mailto:ciw@gov.wales">ciw@gov.wales</a> Website: <a href="http://www.careinspectorate.wales/contact-us">www.careinspectorate.wales/contact-us</a>

<b>TRAINING</b>	No
Is training required?	
Details of training	N/A
<b>COMPLIANCE</b>	Compliance with this policy will be monitored through senior leaders and managers
How is compliance within this document going to be monitored?	

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EQUALITY IMPACT ASSESSMENT AND PROCEDURAL INFORMATION		
	Positive/Negative/N/A	Comments
Does the document have a positive or negative impact on one group of people over another based on their:		
• Age?	N/A	
• Disability	N/A	
• Gender assignment?	N/A	
• Pregnancy and maternity (which includes breastfeeding)	N/A	
• Race (including nationality, ethnic or national origins or colour)?	N/A	
• Marriage or civil partnership?	N/A	
• Religion or belief?	N/A	
• Sex?	N/A	
• Sexual orientation?	N/A	
If you have identified any potential impact (including any positive impact which may result in more favourable treatment for one particular group of people over another), are any	N/A	

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exceptions valid, legal and/or justifiable?		
If the impact on one of the above groups is likely to be negative:		
Can the impact be avoided?	N/A	
What alternatives are there to achieving the document's aim without the impact?	N/A	
Can the impact be reduced by taking different action?	N/A	
Is there an impact on staff, customer or someone else's privacy?	N/A	
Changes since previous version	Terminology amended to reflect People Team throughout the policy	
Who was involved in developing /reviewing/amending the document? (list titles)	Chief People Officer People Advisor Team Lead	
How confidential is this document	Public	Can be shared freely within and outside of Helping Hands
References		
Associated Documents		

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