



Title: Whistleblowing - Group Policy

Business Function: Applicable to all functions across Sanctuary Group

Author: HR Services

Authorised by: Executive Committee

Sanctuary Group:
Sanctuary Group is a trading name of Sanctuary Housing Association,
an exempt charity, and all of its subsidiaries.

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1. Policy statement

- 1.1 The purpose of this policy is to ensure lawful and best practice is undertaken by all employees and where there is genuine cause for concern, an employee or worker, feels able to raise it without fear of recrimination.
- 1.2 Sanctuary Group (the Group) is committed to high standards of quality and integrity. It is the Group's objective to ensure that staff and workers with concerns about any aspects of the Group's work, feel confident in coming forward and expressing those concerns.
- 1.3 The Group demonstrates its commitment to diversity and equality by valuing diversity and promoting equality and ensuring people are treated according to their individual needs. This ensures that no person or other organisation is discriminated against on the grounds of race, colour, nationality, ethnic or national origins, sex, disability, sexual orientation, gender reassignment, marital or civil partner status, pregnancy or maternity, age, religion or belief, class, appearance, responsibility for dependants, unrelated criminal activities, illness, or any other matter which may cause a person to be treated with prejudice.
- 1.4 Ensuring all services are delivered fairly and equally to all and to the highest possible standard is one of the key objectives of the Group and is in line with current legislative and associated regulatory requirements.

2. Roles and responsibilities

- 2.1 All workers and members of staff have a responsibility to raise genuine concerns regarding dangers to public safety, fraud or other serious malpractice. In addition, members of staff (either line managers or the named individuals in this policy) to whom a concern is reported, have a responsibility to look into the matter fairly and thoroughly.
- 2.2 Directors (or equivalent) are responsible for ensuring adoption of and adherence to this policy and associated procedure.
- 2.3 Managers are responsible for ensuring that the appropriate action is taken in accordance with this policy and associated procedure.
- 2.4 HR Services is responsible for advising managers and employees on the implementation of the policy and process.

3. References and sources

- [Public Interest Disclosure Act 1998](#)
- [Employment Rights Act 1996](#)
- [Equality Act 2010](#)
- [Bribery Act 2010](#)
- [Fraud Investigation and Reporting - Group Policy and Procedure](#)
- [Grievance - Group Policy and Procedure](#)
- [Bullying and Harassment - Group Policy and Procedure](#)
- [Prevention of Bribery - Group Policy and Procedure.](#)

4. Impact on diversity

- 4.1 The Group demonstrates its commitment to diversity and promoting equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the [Equality Act 2010](#) and in accordance with its '[Fairness for All](#)' Single Equality Scheme.

5. Resident consultation

- 5.1 This policy and associated procedure is for internal use only; therefore, resident consultation is not required.

6. Monitoring and compliance

- 6.1 The contents of this policy and associated procedure will be updated by HR Services accordingly in line with legislation and the Group's objectives.
- 6.2 Period of review
- 6.2.1 Until a new policy is formally adopted this document will remain in force and operational.
- 6.2.2 This policy will be reviewed in accordance with the policy review programme agreed by Executive Committee.
- 6.2.3 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations, Group Director - Corporate Services will initiate an immediate review.
- 6.2.4 Where appropriate, key stakeholders, employees and interested parties will be consulted as part of any review of this policy.

7. Approval

- 7.1 This policy is approved by Sanctuary Group's Executive Committee.

8. Operational arrangements

- 8.1 This policy should be used in conjunction with the [Whistleblowing - Group Procedure](#).