



Putting People 1st

Whistleblowing Policy

G.02

Reviewed

24 Sept 2025

Date next due for review:

Sept 2028

This policy document can be produced in various formats, for instance, in larger print or audio-format; and it can also be translated into other languages, as appropriate.

Our equality and diversity policy statement describes our key equality commitments that we use to develop all organisational services; this includes employment services and services to tenants and other customers.

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The Scottish Housing Regulator Reg. No: HAC231; Registered Scottish Charity No: SC038237;
FCA Reg. No: 2375R(S); Property Factor Reg. No: PF000151

Introduction

Pineview Housing Association Ltd 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, the Association would encourage and expect those who have serious concerns about any aspect of the Association's work to come forward and speak up without fear of reprisal. Therefore, the Association recognises that it is an important aspect of accountability and transparency to provide a mechanism to ensure that no employee, committee/board member or stakeholder of the Association feel at a disadvantage in raising legitimate concerns.

The Public Interest Disclosure Act, which came into effect in 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, Committee/Board and Stakeholders working for or acting on behalf of the Association are covered by this policy. The policy also applies to suppliers and those providing services under a contract within the Association.

If you are a customer, member of the public or other service user, you should raise any concerns regarding "Whistleblowing" directly with the Director, or in writing marked "Private & Confidential" FAO Director.

Scope of Policy

This policy is designed to enable employees of the Association 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 the Association, 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 those employees of the Association who disclose such concerns provided the disclosure is made:

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

The Association 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 identity to anyone, we will endeavour to 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 may be considered at the discretion of the Association.

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 Director.

Any complaints will be investigated by the Director unless the complaint is against the Director or is in any way related to their actions. Where the complaint is related to the Director it should be addressed to the Chairperson 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, the Association 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 the Association's existing policies and procedures.

Outcomes of Investigation

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.

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 Management Committee. If, after appealing internally the individual is still not satisfied with the outcome, they can raise the issue with the appropriate external body as outlined in Appendix 1.

Raising a Concern Externally

The Association 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:

The organisation will treat your personal data in line with our obligations under the current data protection regulations and our own [insert name of policy or procedure]. Information regarding how your data will be used and the basis for processing your data is provided in the Association'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.

Reporting

Any whistleblowing case will be reported to the Management Committee at each meeting until conclusion. This will include the date and description of any such incident, the outcome of the investigation and subsequent action taken.

Recording Incidents

All incidents will be added to the Fraud Register and/or the Whistleblowing Register which will be reported on at each meeting of Management Committee. This will include the date and description of any such incident, the outcome of the investigation and subsequent action taken. The Committee will provide oversight of the Registers ensuring that all cases are handled within the terms and timescales set out in the Policies.

Notifications of Incidents to the SHR

All cases will be notified to the Scottish Housing Regulator without delay and in accordance with regulatory guidance regarding Notifiable Events.

Reporting Financial Irregularities

We are required to report all financial irregularities to our external auditors and in some cases to our Insurers and this will be undertaken in writing without delay.

Monitoring & Review

Responsibility for monitoring the application of this policy will rest with the Director of the Association.

This policy will be reviewed every three years to ensure it continues to meet legislative and organisational needs or where EVH issues a revised Model Policy, whichever is sooner.

Any amendments will be communicated to all staff and relevant stakeholders.

Appendix 1

List of Prescribed Persons

Scottish Housing Regulator

Guidance - <https://www.housingregulator.gov.scot/for-landlords/advisory-guidance/how-we-work/information-about-whistleblowing/>

Tel: 0141 242 5642

E-mail: shr@shr.gov.scot

Scottish Housing Regulator

5th floor, 220 High Street, Glasgow, G4 0QW

Scottish Housing Regulator

The Scottish Housing Regulator is a prescribed person to whom a disclosure can be made about social landlords' performance of housing activities; the registration of registered social landlords; and social landlords' financial well-being and standards of governance. They have produced two information leaflets regarding Whistleblowing about a regulated body – one for potential whistleblowers and one for regulated bodies regarding what the SHR will do - both can be access from SHR website.

- <https://www.housingregulator.gov.scot/for-landlords/advisory-guidance/how-we-work/information-about-whistleblowing/>
- <https://www.housingregulator.gov.scot/for-landlords/advisory-guidance/how-we-work/how-we-will-deal-with-whistleblowing-concerns-about-your-organisation/>

Glasgow City Council Environmental Health

Phone: 0141 287 1059

Email: healthandsafety@glasgow.gov.uk

Health and Safety Executive

<https://www.hse.gov.uk/contact/index.htm>

Advisory Service Tel: 0300 003 1647

A list of prescribed persons / bodies can be found at this link - Whistleblowing: list of prescribed people and bodies - GOV.UK

Further Sources of Information

ACAS

Helpline: 08457474747

www.acs.org.uk

Protect

Tel (general): 020 3117 2520

<https://protect-advice.org.uk/>

Unite the Union

Tel: 0141 404 5424

Citizen's Advice - Glasgow - Drumchapel Citizens Advice Bureau

Tel: 0141 944 2612