

1.0 Introduction

- 1.1 Saffron Housing Trust ("Saffron") is committed to the highest standards of quality, probity, openness and accountability. It encourages a free and open culture in all its dealings with colleagues, Board and committee members, and all those with whom it engages in business. Saffron is committed to act on any allegations of fraud, abuse, harassment, or malpractice whether raised from inside or outside the organisation.
- 1.2 This policy has been produced in accordance with the Public Interest Disclosure Act 1998 (PIDA), which protects individuals from detrimental treatment or victimisation if, in the public interest, they blow the whistle on wrongdoing.
- 1.3 This policy aims to encourage individuals to feel confident in raising serious concerns and to question and act upon concerns about practice. It will: provide the opportunity for individuals to raise concerns and receive feedback on any action taken; ensure that individuals receive a response to concerns and are aware how to pursue them if not satisfied; and reassure individuals that they are protected from possible reprisals or victimisation, including detriment and unfair dismissal in certain cases.
- 1.4 This policy is not intended to replace the Grievance Procedure, which should be used where colleagues are concerned about their own personal employment situation. Complaints about breaches of an individual's own contract of employment should be raised as a grievance. If you are unsure which process applies, contact the People team.
- 1.5 All Board and committee members and colleagues will be made aware of this policy during their induction.

2.0 Purpose

- 2.1 In adopting the NHF Code of Governance (2020), the Saffron Group Board committed to ensuring proper arrangements for the referral and determination of individual cases raising issues of conflicts, ethics, or probity. The 2020 NHF Code requires clear and well-publicised arrangements for colleagues and others to raise confidential concerns with a designated non-executive member of the Board (other than the Chair) where these are serious and cannot appropriately be raised through usual channels, and for these to be dealt with through proportionate and independent investigation as necessary. This designated member is the Senior Independent Director.
- 2.2 It is a Code of Conduct (NHF 2022) requirement (Section G – Reporting Concerns) that any reasonable suspicion of possible wrongdoing must be reported to the appropriate person in line with Saffron's relevant policies and procedures. The Code

of Conduct also requires that Saffron must not victimise or disadvantage any person who uses or intends to use the confidential reporting (whistleblowing) procedures to report actual or alleged wrongdoing.

- 2.3 To provide a safe, accessible, and confidential mechanism for raising genuine concerns about wrongdoing, risk, or malpractice within the Saffron Group.
- 2.4 To protect colleagues and others who raise genuine concerns in good faith from detriment, victimisation, or unfair treatment as a result of speaking up.
- 2.5 To ensure that concerns raised are investigated promptly, impartially, and to an appropriate standard, with outcomes communicated to the person who raised the concern.
- 2.6 To support Saffron's culture of transparency, accountability, and continuous improvement.

3.0 Scope

- 3.1 This policy applies to individuals in the following categories: employees of the Saffron Group and all its members; agency and contract workers; self-employed contractors; persons on work experience or training within the Saffron Group; and employees of any third party service provider (contractors, support providers, agency staff etc.).
- 3.2 The PIDA covers "employees and workers". The spirit of this policy applies to all individuals listed above; however, those who are not employees or workers cannot enjoy the full legal protection afforded to workers under PIDA.
- 3.3 Involved residents who are not Board or committee members are expected to follow Saffron's Complaints Procedure in the first instance if they wish to raise matters of concern.
- 3.4 This policy does not replace or override the Grievance Policy, Safeguarding Policy, or Data Protection and Privacy Policy. Where a concern engages more than one policy, the Head of Governance will coordinate the appropriate response.

4.0 Legislation and Compliance Framework

- 4.1 Public Interest Disclosure Act 1998 (PIDA) – provides the primary statutory framework for whistleblower protection in the United Kingdom.

- 4.2 Employment Rights Act 1996 (as amended) – protects workers from unfair dismissal or other detriment where the reason is that they made a protected disclosure.
- 4.3 Worker Protection (Amendment of Equality Act 2010) Act 2023 – strengthens employer duties in relation to the prevention of sexual harassment in the workplace.
- 4.4 RSH Governance and Financial Viability Standard – requires registered providers to have effective governance arrangements that enable the organisation to be run with integrity and to manage risk in an effective and transparent way.
- 4.5 NHF Code of Governance 2020 – sets expectations for boards around organisational culture, ethical conduct, accountability, and the management of conflicts of interest.
- 4.6 UK GDPR and Data Protection Act 2018 – governs the lawful processing of personal data arising from any investigation carried out under this policy.

5.0 Definitions

- 5.1 Speaking up / Whistleblowing: the disclosure of information which a person reasonably believes tends to show one or more of the qualifying concerns set out in section 7. This is also referred to as making a “protected disclosure” under PIDA.
- 5.2 Good faith: raising a concern honestly and without malicious intent. You do not need to be correct in your belief. Deliberately false or malicious allegations are not protected by this policy.
- 5.3 Prescribed person: a regulatory body or official authorised to receive protected disclosures under PIDA, such as the Regulator of Social Housing, the Housing Ombudsman Service, or the Health and Safety Executive.
- 5.4 Senior Independent Director (SID): the designated non-executive member of the Board to whom confidential concerns may be raised where these cannot appropriately be raised through the usual internal channels.
- 5.5 Detriment: any action or omission that puts a person at a disadvantage because they have raised a concern in good faith. This includes dismissal, demotion, exclusion, harassment, changes to duties, or any other form of unfair treatment.
- 5.6 Anonymous concern: a concern raised without identifying the person raising it. Anonymous concerns may limit the scope of investigation but Saffron will endeavour to act on them where sufficient information is provided.

6.0 Roles and Responsibilities

- 6.1 The Board has overall responsibility for ensuring the Saffron Group operates with integrity and maintains an effective speaking up culture. The Audit and Risk Committee (ARC) approves this policy and scrutinises reports on all speaking up cases on behalf of the Board and ensures appropriate action is taken, receiving quarterly reports on whistleblowing activity.
- 6.2 The Head of Governance / Company Secretary is responsible for the effective implementation of this policy. The Head of Governance is the policy owner, maintaining the confidential register of disclosures, coordinating investigations, and providing reports to the ARC.
- 6.3 The Senior Independent Director (SID) acts as the designated non-executive contact for colleagues who have serious concerns that cannot appropriately be raised through the usual internal channels, consistent with the NHF Code of Governance 2020 requirements.
- 6.4 The Executive Team has responsibility for embedding a culture of speaking up across the organisation and will be informed of all disclosures, except where the concern relates to the Chief Executive directly, in which case the matter is referred to the Senior Independent Director.
- 6.5 The Chief People and Change Officer is responsible for colleague welfare during and following any investigation, and for ensuring that any allegation of detriment or victimisation arising from this policy is addressed through appropriate HR processes.
- 6.6 All colleagues and managers have a responsibility to act with integrity, to raise genuine concerns promptly, and to support a culture of openness. Managers must not discourage concerns from being raised and must refer any concern raised with them through this policy without delay.

7.0 Policy Statement

- 7.1 To be covered by whistleblowing law, a worker making a disclosure must reasonably believe two things: first, that they are acting in the public interest (personal grievances and complaints are not usually covered); and second, that the disclosure tends to show past, present, or likely future wrongdoing falling into one or more of the following categories:
- criminal offences (including, for example, types of financial impropriety such as fraud)
 - failure to comply with an obligation set out in law

- miscarriages of justice
- endangering of someone's health and safety
- sexual harassment – from April 2026, sexual harassment is an explicit qualifying disclosure under whistleblowing law (PIDA 1998). This means colleagues who raise concerns about sexual harassment are protected from detriment and unfair dismissal as whistleblowers. Saffron is committed to ensuring colleagues are clear that concerns of this nature are protected disclosures and can be raised safely and confidently under this policy.
- damage to the environment
- covering up wrongdoing in any of the above categories.
- Serious failures in service quality or safety affecting tenants, including safeguarding concerns, are also qualifying matters under this policy.

7.2 Saffron is committed to ensuring that anyone who raises a genuine concern in good faith will not suffer detriment as a result. This commitment applies throughout the investigation and its aftermath. Victimising, bullying, or any other action intending to deter a colleague from making a disclosure, or by way of retaliation following a disclosure, will be regarded as a serious disciplinary offence.

7.3 All concerns will be treated confidentially. The identity of the person raising a concern will only be disclosed where strictly necessary for the investigation to proceed, or where there is a legal obligation to do so. Where disclosure is required, the individual will be informed in advance wherever possible. Saffron will make every effort to protect an individual's anonymity; however, the individual should be aware that if anonymity is preserved this may limit the investigation, particularly where the individual may be required as a witness.

7.4 Deliberately making a false or malicious allegation is not protected by this policy. Anyone found to be knowingly raising unfounded allegations or consistently using the policy for trivial matters may be subject to investigation under Saffron's Disciplinary Procedure.

8.0 Procedures / Policy Implementation

8.1 Saffron encourages individuals to raise concerns in the first instance within the organisation. In most cases, individuals should be able to raise concerns with their immediate line manager. If this is not possible (for example, if the concern relates to the line manager), individuals should speak to, in order: Head of People and Workplace; Head of Governance / Company Secretary; a member of the Chief Officers; Chief Executive Officer; Chair of the Audit and Risk Committee.

- 8.2 If, for whatever reason, a colleague feels unable to raise concerns within Saffron or through the usual channels, they may contact the Senior Independent Director or the Group's internal or external auditors. Internal contact details are available in the staff directory on the Intranet or by contacting the Customer Contact Team on 01508 532000. The current designated contacts are: Senior Independent Director – Rob Lankey (RLankey@saffronhousing.co.uk); Internal auditors – TIAA (Claire Lavery, Claire.Lavery@tiaa.co.uk); External auditors – Crowe U.K LLP (Vincent Marke, vincent.marke@crowe.co.uk).
- 8.3 When raising a concern, provide as much detail as possible: the nature of the concern; the individuals involved; relevant dates, locations, and events; and any supporting evidence available. You are not expected to have definitive proof before raising a concern – a reasonable belief is sufficient.
- 8.4 The line manager or person receiving the concern will arrange an investigation (either by investigating the matter themselves or passing the issue to someone more senior). The investigation may involve the individual and others giving a written statement. The individual's statement will be taken into account and they will be asked to comment on any additional evidence obtained.
- 8.5 On receipt of a concern, the Head of Governance will: acknowledge receipt within five working days; assess the nature of the concern and determine the appropriate investigation route; inform the Executive Team (unless the concern involves the Chief Executive, in which case the matter is referred to the Senior Independent Director); keep the person who raised the concern informed of progress subject to confidentiality; and provide a summary outcome ordinarily within 28 working days.
- 8.6 On conclusion of any investigation, subject to any legal restraints, the individual will be told the outcome and what action has been taken or is proposed by the Executive Team. If no action is taken, the reason will be explained. If any investigation results in disciplinary action, the normal disciplinary procedure will be followed.
- 8.7 If the individual is concerned that their line manager is involved in the wrongdoing, has failed to make a proper investigation, or has failed to report the outcome to the Chief Officers, they should inform the Head of Governance / Company Secretary, who will arrange for a further review.
- 8.8 If on conclusion of the internal procedure the individual reasonably believes appropriate action has not been taken, they may report the matter to a prescribed person or body. A full list of prescribed persons and bodies is available at: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

In following this procedure, colleagues have the right to be accompanied by a trade union representative, a colleague, or a friend.

- 8.9 Any data held or collated within the scope of this policy will be handled in accordance with the Saffron Group's Data Protection Policy and Procedures.

9.0 Monitoring and Compliance

- 9.1 Any allegations reported either internally or externally will be confidentially monitored by the Company Secretary on behalf of the Audit and Risk Committee. The Company Secretary will maintain a confidential register of speaking up (whistleblowing) allegations, investigations, and outcomes in line with best practice guidelines.
- 9.2 The Company Secretary will report whistleblowing activity to the Audit and Risk Committee on a quarterly basis. The ARC scrutinises these reports on behalf of the Board and ensures that appropriate action is taken.
- 9.3 An anonymised summary of speaking up activity will also be escalated to the Board as appropriate.
- 9.4 Any colleague found to have subjected another person to detriment for raising a concern in good faith may face disciplinary action up to and including dismissal. Any colleague found to have made a deliberately false or malicious allegation may similarly face disciplinary action.
- 9.5 Compliance with this policy is monitored as part of Saffron's internal audit programme, coordinated through the Head of Governance.

10.0 Training and Awareness

- 10.1 All new Board and committee members and colleagues will be made aware of this policy during their induction.
- 10.2 Awareness of this policy will be maintained through: inclusion on Saffron's intranet and policy register, accessible to all colleagues; periodic all-colleague communications, particularly following any policy update; and manager briefings to support people managers in handling concerns referred to them.
- 10.3 Colleagues who wish to seek independent advice whilst considering making a disclosure may contact Protect (formerly Public Concern at Work), a charity providing confidential advice to individuals who have witnessed wrongdoing in their workplace.

Protect advice line: 020 3117 2520 (option 1); email: whistle@protect-advice.org.uk; web: <https://protect-advice.org.uk>

- 10.4 If a colleague believes they have been unfairly treated because they have blown the whistle, they may decide to take their case to an Employment Tribunal. The process would involve attempted resolution through the Advisory, Conciliation and Arbitration Service (ACAS).

11.0 Related Policies and Documents

- 11.1 Code of Conduct (NHF 2022)
- 11.2 Anti-Bribery and Corruption Policy
- 11.3 Fraud Prevention and Response Policy
- 11.4 Grievance Policy
- 11.5 Disciplinary Policy
- 11.6 Safeguarding Policy
- 11.7 Data Protection Policy
- 11.8 Privacy Notices

Policy Title/Reference	Speaking Up (Whistleblowing) Policy
Author/Owner	Head of Governance / Company Secretary
Version Number	V6.0
Approval Date	July 2026
Review Date	July 2029
Approval Authority	Board (ARC review on behalf of Board)
Consulted with Tenant Group	Not applicable