

## **Whistleblowing Policy and Procedure**

### **1. Introduction**

- 1.1** This policy applies to all directors and employees of Goram Homes Limited ("Goram Homes"). Other individuals performing functions in relation to Goram Homes, such as agency workers and contractors, should also use it.
- 1.2** Goram Homes is committed to the highest standards of propriety, probity and ethical behaviour, and expect all people working for it to act with honesty and integrity.
- 1.3** It is important that any fraud, misconduct or wrongdoing by directors, employees or other workers is reported and properly dealt with. Goram Homes therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is being run.
- 1.4** Any employees who have concerns over any aspect of conduct should feel free to come forward and voice those concerns. The policy makes it clear to employees that they can do so without fear of victimisation, subsequent discrimination or disadvantage. It does however recognise that in some cases, people may wish to report on a confidential basis.
- 1.4** This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

### **2. Background**

- 2.1** Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This may include:
- criminal activity;
  - failure to comply with any legal or professional obligation or regulatory requirements;
  - miscarriages of justice;
  - danger to health and safety;
  - damage to the environment;
  - fraud, corruption and bribery;
  - financial mismanagement or inappropriate use of funds;
  - breach of internal policies and procedures;
  - conduct likely to damage our reputation or financial wellbeing;
  - unauthorised disclosure of confidential information;
  - negligence;
  - Modern Slavery or other unethical conduct;
  - the deliberate concealment of any of the above matters.

**2.2** It is not necessary to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The employee has no responsibility for investigating the matter - it is the organisation's responsibility to ensure that an investigation takes place.

**2.3** Goram Homes encourages employees to raise their concerns under this procedure in the first instance. If an employee is not sure whether or not to raise a concern, they should discuss the issue, in the first instance, with their line manager or the Governance Manager.

### **3 When not to use this procedure**

**3.1** It should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the appropriate Grievance Procedures.

### **4 Raising the concern**

**4.1** We hope that, in the first instance, you would feel able to raise a concern with your line manager or another senior manager of the company. If you suspect the wrongdoing is being perpetrated by managers, or you fear there could be collusion you can contact the Chair of Goram Homes' Audit & Risk Committee.

**4.2** If you feel your concerns have not been addressed appropriately and the internal recourse has been exhausted, users of this policy may contact the Deputy Chief Internal Auditor at Bristol City Council., key contact details are set out in this document.

### **5 Our commitment**

**5.1** If you raise a concern, it will be taken seriously and will be investigated. We will endeavour to protect any individual who makes a good faith disclosure under the policy, from discrimination or victimisation.

**5.2** If you make an allegation in good faith but it is not confirmed by the investigation, no action will be taken against you. However, if you make malicious or vindictive allegations you know to be untrue, disciplinary action may be taken.

### **6 How we handle the concern**

**6.1** The matter will be investigated promptly by independent staff. Investigations will be overseen by the Chair of Goram Homes' Audit & Risk Committee in consultation with the Governance Manager (unless either of those persons are conflicted or the subject of the allegations in which case alternative and appropriate persons that are independent of the allegations will be appointed). Where the whistleblowing concerns allege serious financial wrongdoing, the Governance Manager may refer the matter to Bristol City

Council's Audit Service for investigation following consultation with the Chair of the Audit & Risk Committee.

- 6.2** It is possible that the person undertaking the investigation will want to talk to or meet with the individual who has raised the concern. At any stage the individual raising a concern under the whistleblowing procedure may be accompanied to any meetings by a fellow employee or trade union representative. The whistleblower will be treated with discretion and confidentiality.
- 6.3** The period over which any investigation will take place will depend on the nature of the concern raised but if appropriate, the Governance Manager will advise the individual who has raised the concern of the progress of any investigation (usually within three months).
- 6.4** Once the investigation has been completed, the individual who raised the concern will be informed of the outcome of that investigation. If they do not agree with the outcome, or if they do not feel that the matter has been handled fairly, they may appeal to the Internal Audit Service of Bristol City Council. Appeals must be made in writing within four weeks of the outcome being notified. The BCC Internal Audit Service has full discretion to consider and determine an appeal and that determination is final.

## **7 Confidentiality**

- 7.1** We hope staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.
- 7.2** We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.
- 7.3** However, if you choose to raise a concern anonymously, it will be treated in the same way as where a whistleblower's name is known.

## **8 External disclosures**

- 8.1** The aim of this procedure is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect

(formerly Public Concern at Work) operates a confidential helpline. Their contact details are available below:

Contact	Email/web address	Telephone number
<b>Internal</b>		
Darren Hartley Governance Manager	darren.hartley@goramhomes.co.uk	07764188340
Stephen Baker Managing Director	stephen.baker@goramhomes.co.uk	07935059643
Andrew Martyn-Johns Chair – Audit & Risk Committee	andrewm-j@goramhomes.co.uk	
<b>External</b>		
Alison Mullis Deputy Chief Internal Auditor Bristol City Council	alison.mullis@bristol.gov.uk	
Protect (formerly Public Concern at Work) which is an external body which may be able to give free and independent advice on how to proceed.	whistle@protect-advice.org.uk www.protect-advice.org.uk	(020) 3117 2520

## 9 Monitoring, Consultation and Review

- 9.1** The Goram Homes Audit & Risk Committee will be responsible for and monitor the implementation of this policy. That will include annual reports that include details of any whistleblowing activities undertaken in the relevant reporting year.
- 9.2** This policy will be reviewed every three years or earlier should an update be identified.

## 10 Equality and Diversity

- 10.1** In the application of this policy, Goram Homes will seek to ensure that it is operated to ensure that it does not unfairly impact any individual or group. The protected characteristics are; age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity. Remedial action will be undertaken if a detrimental effect is identified.

## Policy Details and Control

Date of issue	March 2020	
Replacing/Updating	New Policy	
Next Review Date	September 2028	
Drafted by	Original author: Chris Holme – Group Finance Director, BHL	
Contributors	n/a	
Responsible Executive Officer	Stephen Baker	
Version Control		
Version	Date	Changes
1.0		
1.2	5 <sup>th</sup> November 2021	Deleted David Forbes as Joint Company Secretary
1.3	November 2023	Stephen Baker added
1.4	August 2025	Changes to roles including: <ul style="list-style-type: none"><li>- introduction of Governance Manager</li><li>- introduction of Chair of ARC</li><li>- Escalation to BCC</li></ul> Change to standard review period – 3 years Change to responsible body – ARC Updated contact details