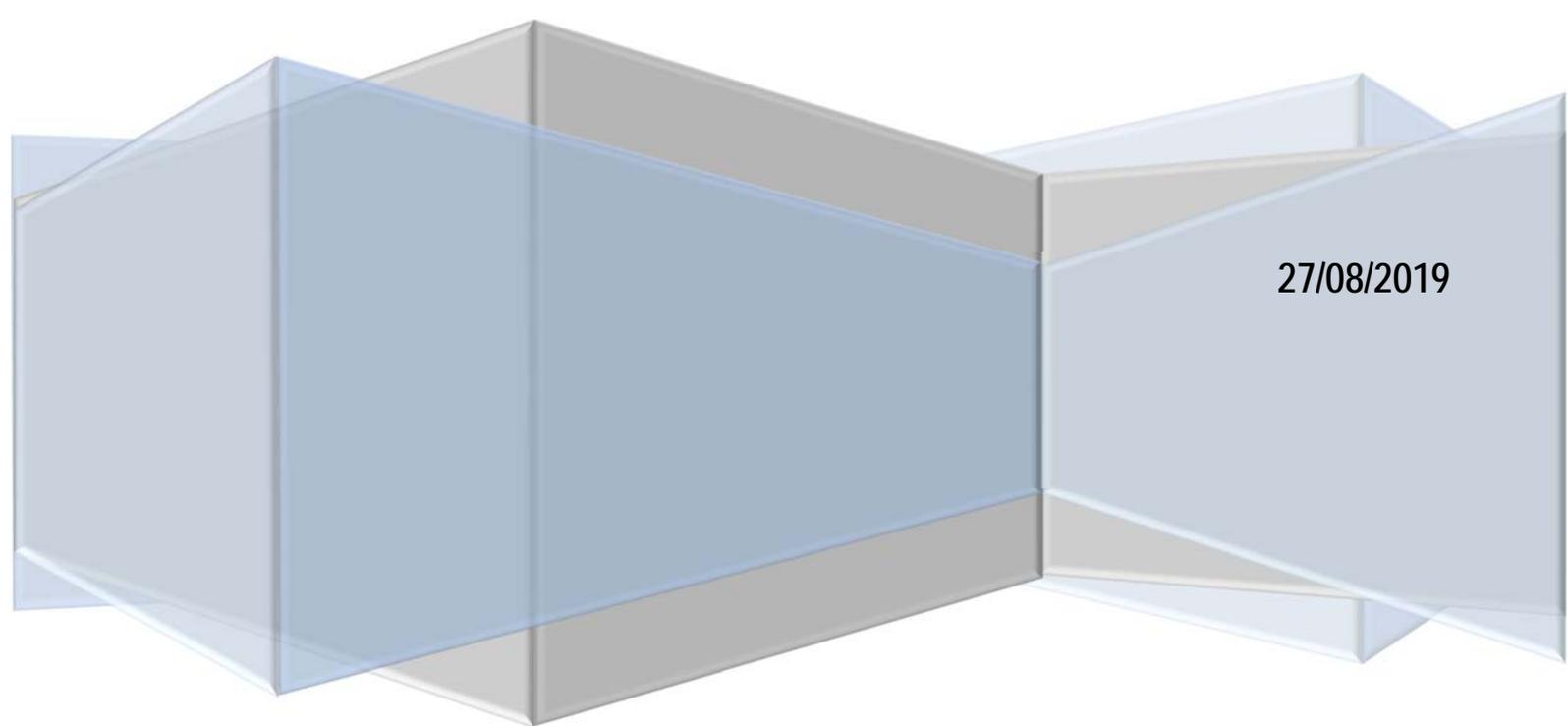


Corporate Governance

Whistleblowing Policy

27/08/2019



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Statement of Policy Aims / Principles

- 1.1 The Association recognises that staff or committee members will very often be the first to suspect misconduct or wrongdoing. While very often it may be innocent, it could turn out to be fraud, a potential public danger or some other form of serious malpractice. The Association wishes to encourage all staff and committee members at all levels to be vigilant and to raise concerns where necessary. This will demonstrate and ensure good practice in all of the Association's activities.
- 1.2 For the purposes of this policy, the following are considered examples of malpractice or potential malpractice in the Association: fraud, corruption, breach of contract, negligence, risks to health and safety, administrative breaches, abuse of those in care, discrimination, pollution or unethical conduct.
- 1.3 This policy outlines:
 - The Association's commitment to openness and good communications;
 - Methods of raising concerns in the workplace by staff;
 - Availability of support to those raising issues of concern; and
 - Methods of dealing with malicious allegations.

Communications & Openness

- 2.1 This policy will be made available to all staff and committee members of the Association and will be the subject of discussion at staff and committee induction. The policy will also be made available to interested parties and publicised accordingly.
- 2.2 The Association considers that staff have a considerable contribution to make in the development of the organisation and the improvement of service quality. That contribution can be ensured through good communication that enables staff to raise ideas or concerns openly. Staff section meetings, general staff meetings and staff attendance at committee meetings all assist in this process and demonstrate the Association's commitment to an open and accountable organisational structure.
- 2.3 The development of policies, which meet the requirements of the law, regulatory bodies and general good practice, further demonstrate the Association's commitment to meet its obligations. Particularly relevant in this area are policies on conflict of interest, gifts and hospitality, health and safety, tendering, housing management, finance and equal opportunities.
- 2.4 It is essential that where concerns are raised and prove to be justified, the Association be given every opportunity to rectify the matter to the satisfaction of those concerned. Consequently the Association undertakes the following:
 - Respect confidentiality;
 - Investigate thoroughly;
 - Provide support and protection;
 - Report on the outcome of investigations; and
 - Disclose the remedial action that is proposed.

YOKER HOUSING ASSOCIATION LIMITED

CORPORATE GOVERNANCE

SUBJECT: WHISTLEBLOWING POLICY

Raising Concerns Within the Workplace

- 3.1 Any staff or committee member who has a concern should raise it in the first instance with either their immediate supervisor, the Director or the Chairperson.
- 3.2 All those who rely upon this policy should be aware that the Association will support all those who have an honest and reasonable suspicion that malpractice has occurred, is occurring or is likely to occur. Confidentiality will be respected if necessary and individuals will be protected from reprisals. Where a staff member feels that they cannot raise the matter with their immediate supervisor or the Director then they should refer the matter to the Chairperson or Secretary of the Association.
- 3.3 Where independent advice is sought, the following sources of advice are available:
 - Internal Auditor: Graham Gillespie, Partner, Wylie & Bisset C.A. (0141) 566 6000
 - External Auditor: Kevin Booth, Partner, Alexander Sloan & Co., C.A. (0141) 204 8989
 - Solicitor: Ian Ferguson, Partner, Mitchells Robertson, Solicitors (0141) 552 3422
- 3.4 Staff can also obtain confidential advice regarding their concerns by contacting their trade union where appropriate or the charity Public Concern at Work (pcaw.org.uk) on 020 7404 6609.
- 3.5 Further information can also be obtained from the Scottish Housing Regulator's publication "Whistleblowing about a regulated body" available from their website at www.scottishhousingregulator.gov.uk/publications.

Malicious Allegations

- 4.1 The Association will be equally firm with those staff or committee members who make false allegations maliciously or recklessly. In such circumstances those individuals will be open to disciplinary action including dismissal or removal from the Management Committee depending upon the particular circumstances.

Severance Payments

- 5.1 The Association does not generally condone the use of severance payments to terminate a contract of employment. Such payments are therefore only made in clearly defined circumstances and must be formally approved by the Association's Management Committee.
- 5.2 Where a severance payment is made and this is accompanied by a settlement agreement the Association will not use this to limit public accountability or whistleblowing.
- 5.3 The Association may not enter into such a settlement agreement unless it has first obtained independent legal advice

Review

- 6.1 In order to ensure that any change in circumstances is accommodated, this policy will be kept under review. As a minimum, this policy will be subject to review as a matter of course every three year(s) in the month of April.
- 6.2 This policy was last reviewed and approved by the Management Committee of Yoker Housing Association Limited at its meeting held on Tuesday the 27th of August 2019.