



Whistleblowing Policy

Approved by: The Board

Approved on: 21 March 2024

Next review Date: February 2026

Everything we do is underpinned by our three KOSMIHC core values:

- **We Know Our Stuff:** we build trust and confidence by being experts in what we do. Our knowledge and skills enable us to get the most important stuff right, providing excellent service and keeping our customers, homes, and each other safe. We embrace change and recognise when we need to adapt, learn, and develop new skills.
 - **We Make It Happen:** We show accountability, energy, and passion for finding speedy resolutions, and do what we say we will. We use collaboration and creativity to work together to find better ways of doing things. We don't stand on the sidelines: we get involved in a way that's meaningful for us. We find joy in what we do and have fun along the way.
 - **We Care:** We care about providing an amazing service to our customers and each other. We treat people as individuals and show empathy by putting ourselves in their shoes. We really listen, being present for both customers and colleagues – making them feel in safe hands. We care about what happens today and tomorrow for our people, communities, homes, and the planet.
-

What is this policy all about?

We're committed to maintaining the highest standards of honesty, openness and accountability and recognise that employees have an important role to play in achieving this goal. We understand that raising a whistleblowing concern can be daunting. However, we encourage you to report concerns internally as soon as possible where you suspect wrongdoing. We are here to listen and will take all concerns that you raise seriously.

This policy sets out the procedure for raising a whistleblowing concern along with the support and protection that is available to you when you do so.

This policy applies to the whole of RHP Group, including RHP, RHP Home and Co-op Homes. This includes all colleagues (including apprentices, trainees and agency workers), Board and Committee members, contractors and sub-contractors.

The definition of whistleblowing and the disclosures it covers are explained below. Personal grievances (such as bullying, harassment or discrimination) are not covered by whistleblowing law, unless the case is in the public interest. Any grievances should be reported under our Grievance Policy.

What do we mean by whistleblowing?

Whistleblowing means disclosing information about certain types of wrongdoing or dangers at work, generally related to unethical, immoral behaviour or a breach of a legal, statutory or regulatory requirement. You are protected by law if you report any of the following as long as you reasonably believe that your disclosure is in the public interest:

- A criminal offence, for example fraud;
- the company is breaking the law, for example does not have the right insurance;
- a miscarriage of justice;
- a risk to the health and safety of an individual;
- risk or actual damage to the environment;
- circumstances that give rise to an enhanced risk of slavery or human trafficking in our direct activities or supply chain;
- an attempt to cover up wrongdoing.

You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

Confidentiality and anonymity

We want you to feel comfortable about raising a whistleblowing concern openly and we actively encourage you to do so.

Where you raise a whistleblowing concern openly, we will ensure confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand.

Alternatively, you may decide to raise a whistleblowing concern anonymously.

Our commitment to you

If you raise a whistleblowing concern, we are committed to making sure you are protected. This means you will not be subjected to any negative treatment (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern.

If you raise a whistleblowing concern in the way this policy outlines, we will make sure you are treated with respect and provided with support and protection.

If you are told not to raise a whistleblowing concern, or you believe you have had negative treatment because you have raised a whistleblowing concern, you should report the matter to the Head of People or raise it under our grievance procedure. Any such behaviour will not be tolerated and will be treated as a disciplinary offence.

If we find that an individual has knowingly raised false allegations, this will also be treated as a disciplinary offence and will be dealt with under our disciplinary procedure.

While we can't always guarantee the outcome that you may be seeking, we'll try to deal with your concern fairly and in an appropriate way. If you are not happy with the way that your concern has been handled, this can be raised with the Executive Director of Corporate Services (who is also our Company Secretary), or ultimately the Chair of the Group Audit Committee.

How to make a report

You can raise a whistleblowing concern either verbally or in writing. We would typically expect this to be to the Head of People or the Executive Director of Corporate Services, who is also the Company Secretary for RHP in the first instance. It is important that you set out clearly:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- and what action (if any) you are seeking.

We encourage you to raise your whistleblowing concerns internally in the first instance. If you feel that appropriate action has not been taken or there may be urgent and exceptional circumstances where you may feel it necessary to report your concerns to a regulatory body:

- For most cases, this will be the Regulator of Social Housing (RSH). More information on the RSH can be found at <https://www.gov.uk/government/organisations/regulator-of-social-housing>
- If the report is concerning abuse of vulnerable people and the issue is safeguarding you should report it to the Local Authority Social Services Registered Office for the Safeguarding team/officer.
- In the case of any fraud you should report it to:
 - RHP Group's Internal Auditors –Beever & Struthers - via email enquiries@beeverstruthers.co.uk or via post at 15 Bunhill Row, London, EC1Y 8LP, or telephone 020 3478 8400; or
 - RHP Group's External Auditors – PKF Littlejohn LLP – via email info@pkf-l.com or via post at 15 Westferry Circus, Canary Wharf, London E14 4HD, or telephone 0207 516 2200.

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met. The charity Protect offers whistleblowing advice: <https://protect-advice.org.uk/contact-us/>.

What will happen when we receive a whistleblowing report from an individual?

We take all whistleblowing concerns seriously. We will act fairly to all parties involved and will investigate carefully and thoroughly, finding out the facts before making any decisions.

In most cases, we'll ask you to attend a meeting to explain the nature of your concern to an independent manager (known as the investigating manager). This will be arranged as soon as

possible. You may, if you wish, bring a colleague or a trade union representative with you to the meeting. Where it is considered appropriate, a member of the People team may also be present.

After gaining further details from you, the investigating manager will then complete an investigation to gather the facts. The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing.

All reports of whistleblowing and findings from whistleblowing investigations will be reported to the Group Audit Committee.

Without breaching other areas of confidentiality, where possible any results of an investigation will be reported back to the employee who raised the concern.

What will happen when we receive an anonymous whistleblowing report?

We encourage anonymous reporting over remaining silent. We will always consider any concern that is reported anonymously, however the decision to investigate will be entirely at our discretion.