

Whistleblowing Policy

1. What this policy is about

- 1.1 Whistleblowing is where a colleague, contractor or supplier goes outside normal management channels to report suspected wrongdoing, ie speaking out in a confidential manner.
- 1.2 We encourage anyone with serious concerns about any aspect of our business to raise them. You can help us by reporting all serious concerns. This Policy applies to all Board members and colleagues across the organisation including consultants or contractors working with us.

Types of issues covered by the policy

- 1.3 Areas of serious concern that may be reported under this Whistleblowing Policy include but are not limited to:
 - Criminal offences or unlawful acts: Any activity that constitutes a criminal offence under applicable law. Including fraud, theft, bribery, corruption, unauthorised use of money or resources or any other illegal conduct that may harm the organisation or the public interest. (see also the Financial Crime Policy, Financial Regulations and Colleague and Board Member Codes of Conduct)
 - Breach of legal obligations: Failure to comply with legal or regulatory duties, whether statutory or contractual. This may involve breaches of employment law, data protection requirements, financial regulations or other legal responsibilities relevant to the organisation's operations.
 - Miscarriage of justice: Situations where an individual is wrongly treated or penalised due to flaws in legal, disciplinary, or investigatory processes. This includes suppression of evidence, biased decision-making, or any action that undermines the fairness of proceedings.
 - Health and safety dangers: Any act or omission that poses a risk to the health, safety, or wellbeing of colleagues, contractors, visitors, or the wider public. This includes unsafe working conditions, failure to follow safety procedures or ignoring known hazards. Allegations related to customers will be dealt with under the Safeguarding Policy (see section on what is not covered by the policy below)
 - Environmental damage: Conduct that causes or risks causing harm to the environment. Examples include pollution, improper waste disposal, destruction of natural habitats or failure to comply with environmental laws and standards.
 - Covering up wrongdoing: Any attempt to conceal, falsify, or suppress information relating to misconduct or wrongdoing. This includes instructing others to remain silent, tampering with records or obstructing investigations or audits.
 - Abuse of position: A person failing to meet appropriate professional standards or abuse of position for unauthorised use or personal gain.
 - Institutional discrimination. The unfair and unequal treatment of individuals through our policies, procedures, and practices where these areas are not

covered by our Equality, Diversity and Inclusion Policy (see what is not covered by the policy below).

What is not covered by the policy

- 1.4 The Whistleblowing Policy does not cover matters included elsewhere, eg:
 - Colleague complaints about employment. Please refer to our Grievance Policy.
 - Customer complaints about our services. Please refer to our Complaints and Compliments Policy.
 - Colleague allegations of bullying or harassment. Please refer to our Dignity at Work Policy.
 - Forms of discrimination. Please refer to our Equality and Diversity and Inclusion Policy.
 - Use of personal data. Please refer to our Data Protection Policy.
 - Safeguarding. Please refer to our Safeguarding Policy.
- 1.5 We may on occasion refer you to another more relevant policy or procedure, eg grievance. Where this is the case, we will provide feedback on reasons for this.
- 1.6 We consider reports of serious concern from external sources where this may be an indicator of significant issues in our control environment as whistleblowing, including where these may be reported directly or through the Regulator of Social Housing. In certain circumstances we may also consider public disclosure to the media.

2. Our approach

- 2.1 We are committed to high standards of honesty, transparency, probity, openness and accountability and encourage people to express their concerns regarding any aspect of their work.
- 2.2 This Whistleblowing Policy aims to:
 - Encourage you to feel confident in raising serious concerns and to question and act upon concerns about our practices.
 - Provide avenues and opportunities for you to raise concerns.
 - Reassure you that you will not be subject to reprisal or victimisation for whistleblowing with reasonable belief of cause for concern.

How to contact us

- 2.3 You should raise your concerns to your line manager or organisational contact in the first instance. If this is not possible, or does not resolve the matter satisfactorily, you can speak to another senior manager.
- 2.4 On occasion, you may need to come forward on a confidential basis. You can do this without fear of reprisal or victimisation. We support those who come forward to express concerns. However, we note that the use of this policy is where usual management procedures are not appropriate or have failed.



- 2.5 Whistleblowing concerns can be emailed to: antifraud@livvhousinggroup.com. You can also contact the Director of Risk, Audit and Assurance directly either verbally or in writing.

Confidentiality

- 2.6 We understand you might be reluctant to come forward with information and recognise you may wish to raise concerns in confidence. We encourage you to give your name when raising concerns, this way we can assure you we take your concerns seriously. Also, anonymous allegations are more difficult to investigate. The Director of Risk, Audit and Assurance will decide whether to investigate any anonymous allegations.
- 2.7 When you raise a concern, we will take reasonable care to restrict revealing your identity.

Colleague responsibility

- 2.8 All colleagues have a duty to raise any reasonably held suspicions or matters of serious concern. If anyone tries to discourage a colleague from coming forward to express a concern, we may refer this as a disciplinary matter.
- 2.9 Colleagues should note their responsibility to maintain confidentiality in relation to information they may have access to during their employment unless this relates to issues of concern in this area

Dealing with concerns

- 2.10 We consider all whistleblowing concerns objectively and see this as an opportunity to help us strengthen our arrangements, as well as investigating the source and cause of the concern. Whilst the use of this policy is reactive and our last line of defence, we value all the concerns raised to us through this policy and carefully consider each one.
- 2.11 We investigate all concerns raised to a level relevant to the nature of the concern. The Audit and Risk Committee maintain oversight of reporting under this Policy in respect of the level, nature and action taken in relation to any whistleblowing allegations received.
- 2.12 When you raise a concern, we will consider it carefully and thoroughly. We must be fair to you and any colleagues involved. We investigate all aspects and respect concerns you may have expressed regarding your own safety or career.
- 2.13 You may request we let you know the outcome from an investigation. Whilst doing this we have to continue to respect the confidentiality of other colleagues or parties involved and therefore informing you of the outcome is not mandatory.
- 2.14 Nobody who comes forward with reasonable belief of cause for concern has anything to fear. It is important to note that abuse of the whistleblowing policy, for instance by maliciously raising unfounded allegations, may result in this being referred as a disciplinary matter.



3. Responsibilities

- 3.1. All colleagues are responsible for carrying out their work in line with this policy and associated procedures. The Director of Risk, Audit and Assurance is responsible for overall implementation of this policy.
- 3.2. Specific responsibilities are set out below:

Role	Responsibility
Common Board	Ensure that principles of good governance, including transparency and accountability are upheld.
Audit & Risk Committee (ARC)	Approval of the Whistleblowing Policy and oversight, monitoring and review of incidents, related investigations, and the Whistleblowing Register.
Executive Director's Team (EDT)	Treating all matters of reasonably held suspicions or concern raised with due consideration in line with this Policy.
Executive Director – Finance, Risk and Performance	Oversight of the Whistleblowing Policy rests with the EDFRP. Responsibilities include: <ul style="list-style-type: none">• Ensure all reasonably held suspicions or matters of concern are investigated appropriately.• Agree relevant whistleblowing investigations.
Director of Risk, Audit and Assurance	<ul style="list-style-type: none">• Develop, maintain and promote the Whistleblowing Policy.• Support Directors in control and assurance activity including where suspicions are reasonably held or matters of concern may be raised.• Arrange relevant whistleblowing investigation in liaison with the EDFRP.
All employees	All employees have a duty to raise any reasonably held suspicions or matters of concern.
Risk and Assurance team	Facilitate the consistent application of this policy.

4. Monitoring and review

- 4.1. We maintain a Whistleblowing Register, recording all reports of whistleblowing. The Audit and Risk Committee review the register and any reports under this Policy along with investigation activity and planned actions, at each meeting. The escalation and reporting protocol is shown in **Appendix A**.
- 4.2. We will review this policy every three years, or sooner if our monitoring of the policy identifies that changes are required, for example because of changes to law, regulation or related Livv strategies and policies.



Control framework

Compliance

This policy supports compliance with:

- Public Interest Disclosure Act 1998 (PIDA)
- Employment Rights Act 1996
- Human Rights Act 1998
- Data Protection Act 2018 and Data (Use and Access) Act 2025
- Equality Act 2010
- Regulatory Standards

The Public Interest Disclosure Act 1998 aims to protect whistleblowers who make disclosures based on reasonable belief that their disclosure is in the public interest. It protects whistleblowers from inappropriate treatment, ie victimisation or dismissal, for raising concerns about matters in the public interest.

The Public Interest Disclosure Act protects whistleblowers from negative treatment or unfair dismissal. It is part of the Employment Rights Act 1996. The Employment Rights Act makes it automatically unfair to dismiss a worker for making a 'protected disclosure'.

Although the law does not require a whistleblowing policy to be in place, this policy demonstrates the Groups commitment to listen to concerns raised by colleagues and other stakeholders.

Document control	
Version	1.0
Policy applies from	12 November 2025
Policy applies to	Livv Housing Group; Livv Homes; Livv Maintenance; First Ark Social Investment
Approved by	Audit and Risk Committee
Approved on	11 November 2025
Replacing	Whistleblowing Policy 2022 – 2025
Next review due by	November 2028
Responsible Executive Director	Executive Director Finance, Risk and Performance
Policy author	Director of Risk, Audit and Assurance
Equality Analysis	August 2025
Environmental Impact Assessment	Not required
Circulation	Intranet; Livv Housing Group website



Version control

Version	Date of Review	Summary of changes made
1.0	November 2025	Full review of previous policy in line with Group Policy and Strategy Framework.



Appendix A: Escalation and reporting protocol

