



Whistleblowing (Confidential Reporting) Policy

Version:	Final 1 April 2026
Lead Directorate:	Business Services
Approved by:	ARC
Date:	3 July 2026

1. Introduction

- 1.1 PCH values are care, respect, listen and do the right thing; this policy sets out how we can live these values by ensuring genuine matters of concern are raised and effectively investigated.
- 1.2 We are committed to tackle any fraud, abuse or malpractice whether the perpetrators are from outside or inside the organisation. We will do this by:
- encouraging employees, contractors, volunteers or Board members to raise concerns
 - not tolerating reckless, inappropriate or illegal acts
 - taking seriously any genuine concerns raised in good faith and investigating them in accordance with this policy
 - treating people fairly and respecting confidentiality
 - supporting and protecting the person who has raised a genuine concern from reprisals or victimisation
 - not tolerating malicious allegations
 - learning lessons

2. Policy

- 2.1 Whistleblowing is the raising of a concern about a danger, risk, malpractice or wrongdoing; examples include:
- criminal offences
 - failure to comply with legal obligations
 - miscarriages of justice
 - dangers to health or safety
 - dangers to the environment
 - Sexual Harassment
 - deliberate concealment of any of the above

This list is not exhaustive, if you are uncertain whether something is within the scope of this policy, contact the Head of Governance for advice.

- 2.2 Whistleblowing is intended to enable individuals to raise concerns about wrongdoing or malpractice in the public interest. It does not cover personal grievances or complaints that relate solely to an individual's own employment position, such as concerns about pay,

working conditions, relationships with colleagues, or treatment at work. These matters should be raised through the relevant internal policies.

Whistleblowing protections will not apply where a concern is raised maliciously, knowingly false, or for personal gain rather than in the public interest. If you are uncertain whether something is within the scope of this policy, you should ask advice from a contact listed in Appendix A.'

- 2.3 We want to encourage and enable concerns to be raised within PCH rather than ignoring a problem or 'blowing the whistle' outside. This policy will be publicised to staff including with the whistleblowing contacts (Appendix A).
- 2.4 A concern can be raised by someone who works for PCH, either as an employee, contractor or volunteer or a Board member. Concerns raised by other persons will be directed to the Head of Governance in the first instance; they must be related to wider public concerns and not personal matters.
- 2.5 Information about whistleblowing is provided on our intranet and website.

3. Protecting the whistleblower

- 3.1 The Public Interest Disclosure Act 1998 protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest. The Act makes it unlawful for PCH to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.
- 3.2 The whistleblower will need to ensure they make the report in good faith, and they reasonably believe the information disclosed and any allegation contained in it are substantially true.
- 3.3 We want to ensure that concerns can be raised without fear of victimisation, subsequent discrimination, disadvantage or dismissal, so have put these safeguards in place to protect the whistleblower:
 - harassment or victimisation of a whistleblower (including informal pressure) will not be tolerated when they raise a concern in good faith
 - any person found to be unfairly treating a whistleblower will be subject to disciplinary action
 - if there are concerns in relation to repercussions as result of a malpractice being reported, this should be reported to the Head of Governance or an Executive Management Team and the Disciplinary Policy may be followed
 - for those who are not PCH employees, we will endeavor to provide appropriate advice and support, wherever possible
 - they will not suffer detriment for having raised a concern, unless it is later proved that the information provided was false to his or her knowledge
- 3.4 Rarely, a case might arise where the whistleblower has participated in the action causing concern. In such a case it is in the whistleblower's interest to raise a concern as soon as possible. PCH cannot promise not to act against the whistleblower, but the fact that they came forward will be taken into account.

- 3.5 Whistleblowers can obtain their own advice from CAB, Protect (see Appendix A for contact details), ACAS or lawyers.

Confidentiality

- 3.6 PCH will carry out whistleblowing investigations confidentially, wherever possible.
- 3.7 The best way to raise a concern is to do so openly, as this makes it easier to assess the issue, work out how to investigate the matter and obtain more information. A whistleblower may ask for their name not to be revealed without their consent. Although we will explain that disclosure may be required by law and, if disciplinary or other proceedings take place, it may not be possible to take action without the assistance of the whistleblower as a witness.
- 3.8 The whistleblower may request to be informed of the outcome. However, PCH will not be able to inform the whistleblower of any matters which will infringe our duty of confidentiality.
- 3.9 A whistleblower should not disclose confidential information, such as a tenant or contractor, except to those included in the list of prescribed contacts (see Appendix A).

Anonymous allegations

- 3.10 PCH encourages whistleblowers to put their name to the report whenever possible as anonymous concerns are more difficult to investigate. We are also unable to support or protect anonymous whistleblowers.
- 3.11 We will carry out an initial investigation of anonymous concerns. Whether we can make a full investigation will depend on:
- the seriousness of the concern raised
 - the credibility of the concern
 - the likelihood of confirming the allegation from other sources

Malicious allegations

- 3.12 Employees or Board members who are found to have reported a concern maliciously and not in good faith could face a disciplinary process.

4. Reporting and investigating a whistleblowing concern

- 4.1 A whistleblowing concern can be raised using the contacts in Appendix A.
- 4.2 The whistleblower will need to provide:
- the nature of the concern and why they believe it to be true (they are not expected to prove beyond doubt the truth of their suspicion; they will need to demonstrate that they have a genuine concern and that there are reasonable grounds)
 - the background and history of the concern (giving relevant dates and facts)
- 4.3 The whistleblower will be thanked for coming forward with their concerns.

- 4.4 The Head of Governance, in consultation with Executive Management Team and Head of People and Culture will decide how to investigate. If the concern relates to any of those roles, that role will not be consulted, and an alternative will be consulted:
- if the whistleblowing relates to the Chief Executive, the Chair of the Board will be consulted
 - if the whistleblowing relates to the Chair, another Board member and the Chair of Audit and Risk Committee will be consulted
- 4.5 In order to be fair to all involved, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The whistleblower will be contacted to discuss their concerns in the first instance.
- 4.6 The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases, however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately.
- 4.7 Where appropriate, we may raise the matter via:
- a management investigation, or through the disciplinary/grievance/dignity at work process
 - the police, National Crime Agency or Fraud Action
 - the internal or external auditor
- 4.8 The Head of Governance will provide advice to the Executive Management Team and Board whether the whistleblowing is reportable to the Regulators.
- 4.9 The amount of contact with the whistleblower will depend on the nature of the concerns raised, the potential difficulties involved and the clarity of your information.
- 4.10 PCH will do what it can to minimise any difficulties that the whistleblower may experience as a result of raising a concern, i.e. if they are asked to give evidence in criminal or disciplinary proceedings, PCH may arrange for appropriate advice and support, if required.
- 4.11 We aim to carry out any investigations within a reasonable timescale, depending on the nature and seriousness of the concerns raised. A report will be provided to the Executive Management Team and Head of People and Culture (unless the matter concerns one of these roles) who will decide on any action to be taken.

5. How the matter can be taken further

- 5.1 This policy is intended to provide the whistleblower with an avenue within PCH to raise concerns and hopes they will be satisfied with any action taken. If they are not, and they feel it is right to take the matter outside of PCH using our prescribed external contacts (listed in Appendix A). A public disclosure to anyone else could take them outside the protection of the Public Interest Disclosure Act 1998 and this policy. Raising concerns with the media, or through social media, is considered a disciplinary matter.

6. Recording and Monitoring

- 6.1 The Whistleblowing Register will be reviewed by the Audit and Risk Committee annually; cases will be anonymised and lessons learnt provided.
- 6.2 This policy is the responsibility of the Head of Governance and is reviewed every 3 years or sooner if good practice, legislation or regulation changes.

7. Version Control and Approval Dates

Approval stage	Review 2022	Review 2025	Review 2026
Unions	March		March 2026
EMT	May		March 2026
Board or Committees	ARC May		Present to ARC July 2026 for noting as amendment required by changes to legislation.
Review date	June 2025	No changes, reported to ARC Jul 2025	July 2029

Policy Appendix A Whistleblowing Contacts

Internal contacts (these should be used in the first instance):

Chief Executive	Jonathan Cowie jonathan.cowie@plymouthcommunityhomes.co.uk 01752 388301 or 07774 102927 PCH, Plumer House, Tailyour Rd, Crownhill, Plymouth, PL6 5DH
Director of Business Services	Nick Jackson nick.jackson@plymouthcommunityhomes.co.uk 01752 388302 or 07766 367212
Chief People Officer	Laura Avery Laura.avery@plymouthcommunityhomes.co.uk 07860 916936
Director of Homes and Neighbourhoods	Michelle Dawson Michelle.Dawson@plymouthcommunityhomes.co.uk 07720 155274
Director of Place	Chris Brook Chris.brook@plymouthcommunityhomes.co.uk 07701 262632
Interim Head of Governance	Leanne Eastwood Leanne.eastwood@plymouthcommunityhomes.co.uk 07563380523
Chair of PCH Board	Valerie Lee valerie.lee@plymouthcommunityhomes.co.uk
Chair of the Audit and Risk Committee	Emma Lovett Emma.Lovett@plymouthcommunityhomes.co.uk

External contacts:

External auditors	Bishop Fleming Nathan Coughlin, Partner NCoughlin@bishopfleming.co.uk 07974 213567
Internal auditors- menzies	Beever and Struthers Lee Cartwright, Partner LCartwright@beeverstruthers.co.uk 03330 910411
Protect (formerly Public Concern at Work), an independent organisation dealing with probity and integrity in the workplace	020 3117 2520 Advice Line Protect - Speak up stop harm (protect-advice.org.uk)
Police	101 Home Devon and Cornwall Police (devon-cornwall.police.uk)