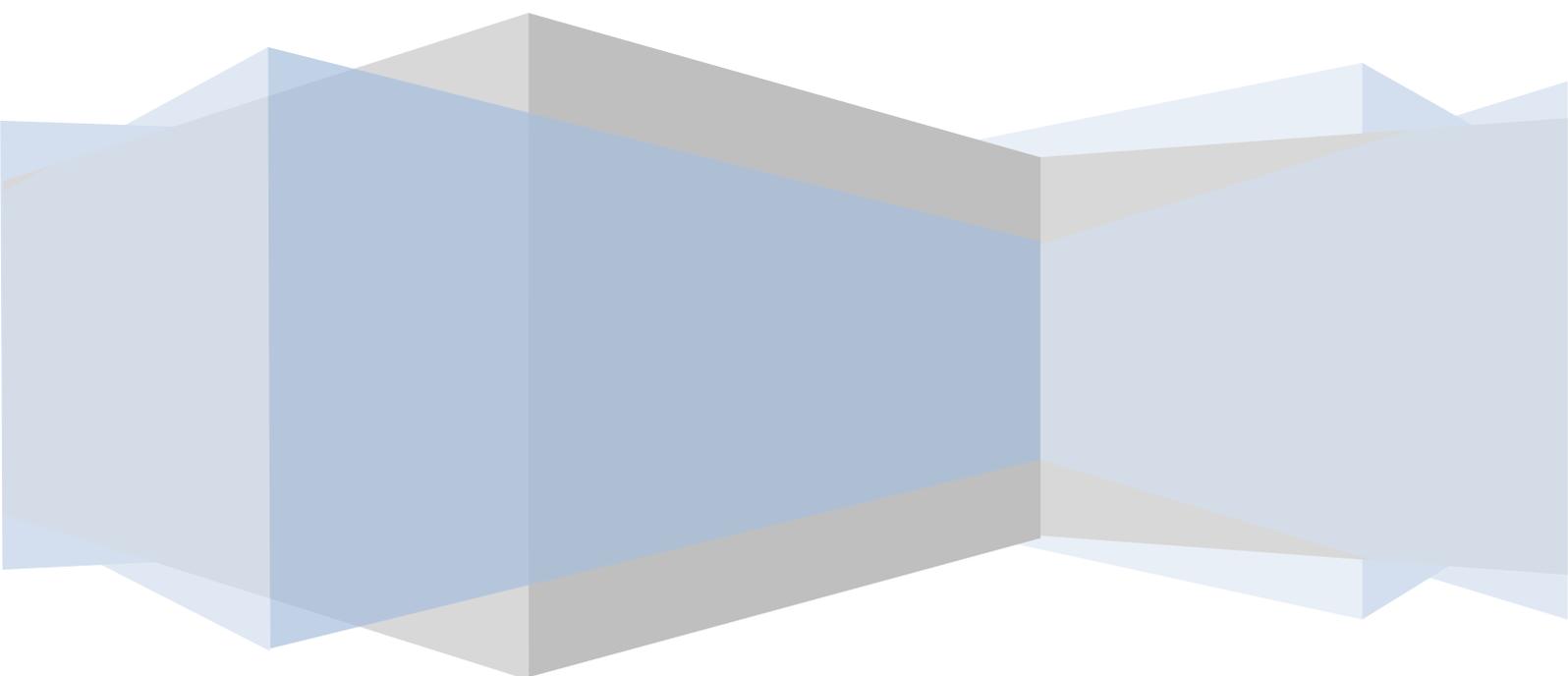




WHISTLEBLOWING POLICY

January 2026



All Policies are available on tape, in braille, and in translation into most languages. Please ask a member of staff if you would like this policy in a different format

Date of Policy Review: January 2026
Date of Committee Approval: 20 January 2026
Date of Next Review: January 2029

SCOTTISH HOUSING REGULATOR STANDARDS	<p>STANDARD 1: The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.</p> <p>STANDARD 2: The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users, and stakeholders. Its primary focus is the sustainable achievement of these priorities.</p> <p>STANDARD 4: The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.</p> <p>STANDARD 5: The RSL conducts its affairs with honesty and integrity.</p> <p>STANDARD 6: The governing body and senior officers have the skills and knowledge they need to be effective.</p>
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Introduction

Cathcart & District Housing Association (CDHA) is committed to the highest standards of openness, probity and accountability. As employees are often the first to realise that there may be something seriously wrong, CDHA would encourage and expect employees who have serious concerns about any aspect of CDHA's work to come forward and speak up without fear of reprisal. Therefore, CDHA recognises that it is an important aspect of accountability and transparency to provide a mechanism to ensure that no employee of CDHA feels at a disadvantage in raising legitimate concerns.

The Public Interest Disclosure Act 1998 and the Employment Rights Act 2025 give legal protection to employees against being dismissed or penalised by their employers as a result of making a protected disclosure (whistleblowing). Concerns which are raised through whistleblowing must be made in the 'public interest' which means that the concerns must affect others such as the public or other stakeholders. Under the Employment Rights Act 2025, disclosures regarding sexual harassment are explicitly protected.

Concerns which are not in the public interest will normally be dealt with through the Grievance Policy. If you are unsure which policy is appropriate to raise your concerns, please contact your line manager to discuss.

All staff, agency workers, committee members, contractors, consultants and other stakeholders working for or acting on behalf of CDHA are covered by this policy. The policy also applies to suppliers and those providing services under a contract within CDHA.

Scope of Policy

This policy is designed to enable employees to raise concerns internally at a senior level to disclose information that the individual believes shows malpractice or impropriety. This policy is intended to cover concerns that are in the public interest and may (at least initially) be investigated separately but may lead to the instigation of other procedures. These concerns might include:

- Financial malpractice, impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to health and safety or the environment
- Criminal activity involving CDHA, its staff, governing body member or stakeholders
- Professional malpractice
- Improper conduct or unethical behaviour
- Sexual harassment
- Failure to meet legal obligations
- Abuse of power or status
- Deliberate attempts to conceal any of the above

Legal Framework

- Public Interest Disclosure Act 1998
- Enterprise & Regulatory Act 2013
- Employment Rights Act 2025

Safeguards

Protection

This policy is designed to offer protection to employees who disclose serious concerns, provided the disclosure is made:

- In the public interest.
- To an appropriate person/body.
- That the individual has reasonable belief in the validity of the concerns being raised.

CDHA will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect the individual when they raise a concern which complies with the above points. In line with the Employment Rights Act 2025, individuals raising concerns regarding sexual harassment are also protected from any detriment, adverse treatment, or unfair dismissal. Any confidentiality or non-disclosure clauses that might otherwise prevent such reporting are void to the extent that they conflict with whistleblowing protections.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal the individual's identity if they so wish. However, at the appropriate time the individual may need to come forward as a witness. If we need to disclose your identity to anyone, we will ensure that you are notified of this in advance.

Anonymous Allegations

This policy encourages individuals to put their names to any disclosures they make. Concerns expressed anonymously are more difficult to investigate, however may be considered at the discretion of CDHA.

Untrue Allegations

If an individual makes an allegation that is not confirmed by the subsequent investigation, it is probable that no action will be taken against them. However, if the individual makes an allegation that is deemed to be made 'in bad faith' i.e. frivolously, maliciously or for personal gain, disciplinary action may be taken against them, and this may be up to and including dismissal.

Raising a Concern

First Step

The individual should raise concerns with their immediate line manager. This information will be passed on as soon as possible to the Director.

Any complaints will be investigated by the Director unless the complaint is against the Director or is in any way related to their actions. Where the complaint is related to the Director, it should be addressed to the Chairperson of the Management Committee who will in turn appoint an independent person to investigate the allegations.

Although the individual is not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate that there are reasonable grounds for their concern.

The earlier the individual expresses their concern, the easier it is to action. The amount of contact between the persons considering the issues and the individual will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, CDHA will seek further information from the individual concerned.

Where any meeting is arranged with the individual that raised the concerns, they can be accompanied by a trade union representative and the meeting can be held off-site if they so wish.

Process

On receipt of a disclosure, the following process will be followed:

- The disclosure will be considered, and, if appropriate, a meeting will be arranged with the individual who raised the concerns to gather initial information.
- Further to this meeting, if appropriate, an independent investigator will be appointed to take forward an investigation into the concerns raised.
- The individual who raised the concerns will be provided with an update and a likely timescale on when they will receive a final response.
- Once the investigation is complete a report will be provided to the individual who instructed the investigation.
- The report will be considered, and appropriate actions will be taken.
- A final outcome will be provided to the individual who raised the concerns.

Depending on the outcome of the investigation, appropriate action will be considered in accordance with CDHA's existing policies and procedures.

Outcome of Investigation

Once the investigation has been completed and the report is received by the Chairperson, a decision on what action to take will be considered. If there are reasonable grounds to substantiate the complaint, an appropriate procedure will be initiated. This may also include referral to an external body or regulator.

Right of Appeal

Where an individual feels that their concern has not been dealt with appropriately, they can appeal the decision internally to the Chair of the Finance & Audit Sub Committee (who should not be an office bearer).

Raising a Concern Externally

CDHA encourages employees to raise concerns internally to allow for appropriate investigation and action to be taken, however if an employee remains dissatisfied with the outcome, they can raise this with the correct prescribed body or person.

This policy does not form part of your contract of employment, therefore it may be updated or withdrawn at any time. If this happens, it will be communicated to you accordingly.

APPENDIX 1

List of Prescribed Persons

The Scottish Housing Regulator
Tel: 0141 242 5642

Environmental Health (Glasgow City Council)
Tel: 0141 287 1059

Health and Safety Executive
Tel: 0845 345 0055

A list of prescribed persons/bodies can be found at this link – [Whistleblowing: list of prescribed people and bodies – GOV.UK](#)

Further Sources of Information

ACAS
Helpline: 0300 123 1100
www.acas.org.uk

Protect (formerly Public Concern at Work)
Tel (general): 020 3117 2520

Unite the Union
Tel: 0141 404 5424

Cathcart & District Housing Association Appendix 2: Equality Impact Assessment

Name of policy to be assessed	Whistleblowing Policy	Is this a new policy or a review?	Review
Person completing the assessment	Emma Connelly, Corporate Services Officer	Date of Assessment	23/12/2025

1. Briefly describe the aims, objectives, and purpose of the policy	<p>The main purpose of the policy is to enable CDHA staff, agency or temporary staff, committee members, consultants, contractors, and any relevant stakeholders to raise concerns internally and disclose information that they believe shows malpractice or impropriety.</p> <p>The Whistleblowing process is designed to prevent the individual from being the subject of victimisation, harassment, or discrimination as a result of their allegations.</p>
2. Who is intended to benefit from the policy? (e.g. staff, applicants, tenants, staff, contractors)	Staff, committee members, tenants, and other key stakeholders.
3. What outcomes are wanted from this policy? (e.g. benefits to customers)	The intended outcome is to encourage anyone who has serious concerns about the Association to come forward and speak up without fear of reprisal. It also provides a clear framework for how any whistleblowing may be dealt with by the Association.

4. Which protected characteristics could be affected by the policy (tick all that apply)		
Minority Ethnic:		Age:
Gender:		Religion/belief:
Disability:		Transgender:
Sexual Orientation:		Maternity/Pregnancy:
Marriage/civil partnership:		Socio-economic status:
5. If the policy is not relevant to any of the protected characteristics listed in part 4. State why and end the process here.		
This policy is equally applicable to all and has no detrimental impact on protected characteristic groups as specified within the Equality Act 2010.		
6. Describe the likely positive or negative impacts the policy could have on the groups identified in part 4.	Positive Impacts	Negative Impacts
7. What actions are required to address the impacts arising from this assessment?	N/A	

Signed: Emma Connelly

Date: 23/12/25