

Whistle Blowing – Confidential Reporting

1. Introduction

- 1.1 Coastline is committed to the highest standards of quality, probity, openness and accountability in line with the corporate values.
- 1.2 As a part of that commitment, Coastline encourages employees or others with serious concerns about any aspect of our work to come forward and express those concerns. In many cases, concerns or complaints will be dealt with through the normal procedures such as mechanisms for resolving grievances, disciplinary matters, or concerns relating to equal opportunities.
- 1.3 However, in some cases Coastline recognises that employees or Non-Executive Directors will need to come forward on a confidential basis. The staff code and procedures make it clear that they can do so without fear of reprisal or victimisation in accordance with the principles of the Public Interest Disclosure Act.
- 1.4 This statement to employees and Non-Executive Directors is intended to underline Coastline's commitment to them, and support for those who come forward to express their concerns.

2.0 Communication

- 2.1 Through the induction and staff briefing procedures, Coastline will support employees on how to recognise the following problems, and to understand the effects they may have on Coastline, their job, and the service Coastline provide.
 - Fraud, corruption and malpractice.
 - Abuse or neglect of vulnerable people.
 - Failure to deliver proper standards of service.
 - Damaging personal conflicts at senior level.
 - Bullying, discrimination, harassment, or victimisation in the workplace.
- 2.2 Coastline will support employees to know what is expected of them, and what practices Coastline regard as unacceptable. Employees should study the Code of Conduct or Non- Executive Directors' Code of Conduct and the guidance on confidentiality carefully, and discuss anything that seems unclear with their manager (for staff) or the Group Board Chairman (for NED's). If they are not sure what to do in a given situation, they should ask before taking any action.
- 2.3 When a problem arises, Coastline will always deal with it seriously. It is understood that Coastline cannot expect employees to practice higher standards than those Coastline apply. Coastline will always pursue fraud and serious abuse as vigorously as possible through the disciplinary procedures or, if necessary, through the courts, frauds are also always reported to the police. Coastline wants employees to feel confident in coming forward and in the fact that Coastline will share the same sense of right and wrong, and act on what the employee tell the company. Anonymous complaints will be investigated and dealt with as considered appropriate in liaison with the Chair of Audit, Assurance & Risk Committee and Company Secretary.

3 Confidential Reporting

- 3.1 Coastline understands that it is never easy to report a concern, particularly one which may relate to fraud or corruption. Coastline ask employees to come forward with any concerns at an early stage, and before problems have a chance to become serious.
- 3.2 Coastline are happy for employees to come forward with another colleague, a friend, trade union representative, another Non-Executive Director or other advisor to report a concern.
- 3.3 Coastline will support concerned employees and Non-Executive Directors and protect them from reprisals or victimisation. If the employee comes forward with a concern, they can be confident that this will not affect their career or their enjoyment of their position. This applies equally if the employee comes forward in good faith with a concern which turns out not to be justified. Support will be provided by the HR Team and the Employee Assistance Programme.
- 3.4 With due regard to legal requirements Coastline will do everything to respect the employee's confidentiality.
- 3.5 If anyone tries to discourage the employee from coming forward to express a concern, Coastline will treat this as a disciplinary offence or breach of the Non-Executive Director Service Agreement. In the same way, Coastline will deal severely with anyone who criticises or victimises the employee after a concern has been expressed.

4 Whom to Contact

- 4.1 In most cases the employee should be able to raise any concerns with their line manager or the Board Chairman for Non-Executive Directors. If for some reason this is not possible, the employee should speak to another senior manager, the Company's Internal Auditor or to the Chief Executive Officer or a senior manager directly and ask for a confidential meeting. All such contacts will be treated in confidence. Concerns raised by a Non- Executive Director regarding the Board Chairman should be raised with the Chief Executive Officer or the Director of Corporate Services.
- 4.2 Where an employee feels unhappy or feels it is inappropriate to raise a concern with their line manager or senior manager, they can contact the nominated Board Member Mr Peter Stephens (peterstephens1@live.com), to express their concerns. In exceptional or in urgent circumstances, it may be more appropriate to contact an external agency. It is not possible to give precise examples but, for instance, relevant situations might be:

- *In the case of a criminal offence, the Police;*
- *In the case of abuse of public funds, the Regulator of Social Housing which is responsible for regulating all registered social landlord; or*
- *In the case of any fraud, the Association's External Auditors and/or the Regulator of Social Housing.*
- *In the case of safeguarding, Safeguarding Adults, –CQC or the Police if immediate danger to life.*

It is Coastline's hope that none of these will ever prove necessary.

- 4.3 The employee can also approach Public Concern at Work for confidential and independent advice– the address is Suite 306, 16 Baldwin's Gardens, London, EC1N 7RJ.

Telephone (general enquiries and helpline) 020 7404 6609.

E-mail – UK general enquiries: whistle@pcaw.org.uk

UK helpline: helpline@pcaw.org.uk

UK services: services@pcaw.org.uk

- 4.4 Performance Audit staff in the relevant regional office of the Regulator of Social Housing who are also able to advise on a confidential basis if the employee are not sure whom to contact about a particular problem. As regulators, they may need to follow up any potential problems identified.
- 4.5 The Chair of the Audit, Assurance & Risk Committee, in liaison with the Company Secretary, will seek advice on whether the matter requires further disclosure to the Charity Commission.

5 Dealing with Concerns

- 5.1 If an employee comes to us with a concern, Coastline will look into it carefully and thoroughly. Coastline have to be fair to the employee, and also to any others that may be involved. If someone is potentially being accused of misconduct, Coastline will undertake thorough investigations, while respecting any concerns the employee has expressed about their own safety or career.
- 5.2 Investigations will be undertaken as promptly as possible, the aim being to complete in 10 working days, if this is not possible timescales will be communicated clearly.
- 5.3 After the Investigation a representative of Coastline will feedback to the whistleblower the findings from the investigation and action taken, while if appropriate respecting any others that have been highlighted as being involved. This confidential feedback will be given whether the concern was found to be justified or not.
- 5.4 If the employee have abused the confidential reporting process, for instance by maliciously raising unfounded allegations, we will treat this as a disciplinary matter.

6.0 MONITORING AND REVIEW OF THIS POLICY

6.1 The Audit, Assurance & Risk Committee will be updated on any cases and actions taken under this Policy and all reasonable steps will be taken to ensure the whistleblower's confidentiality.

6.2 The Chief Executive and Board will ensure that this Policy is implemented, maintained and reviewed. All modifications to this policy must be agreed by the Audit, Assurance & Risk Committee.

6.2 Useful Contacts

Internal Auditors – PWC Craig Sullivan Tel: 07787 566938

External Auditors – KPMG Vicki Sewell Tel: 01752 632229

Care Quality Commission – cqc.org.uk Tel: 03000 616161

Safeguarding Tel. 0300 1234 131

Charity Commission – www.gov.uk/government/organisations/charity-commission

Cross reference to other policies and sections

Dignity at Work Policy & Procedure
Disciplinary Policy & Procedure

Sources of additional guidance

Public Interest Disclosure Act 1998 (Part IVA of Employments Rights Act 1996).