



Whistleblowing Policy

Approved by: RHP Board

Approved: June 2026

Next review Date: June 2028

Applies to: RHP Group

Everything we do is underpinned by our values:

For RHP and RHP Home these are: We know our stuff, We make it happen, We care.

For Co-Op Homes these are: We learn, We deliver, and We care.

1. What is this policy all about?

We're committed to maintaining the highest standards of honesty, openness and accountability and recognise that employees and others have an important role to play in achieving this goal. We encourage a culture where individuals feel safe and supported to speak up about concerns, regardless of their background or personal circumstances. 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 aims to ensure concerns are raised safely, investigated appropriately, and that individuals are protected from retaliation.

2. Who does it apply to?

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 policy also applies to any third party making a whistleblowing disclosure.

3. What do we mean by whistleblowing?

The definition of whistleblowing and the disclosures it covers are explained below. Personal grievances (such as bullying, harassment, sexual harassment or discrimination) will normally be dealt with under the Grievance Policy. However, concerns may constitute whistleblowing where they relate to a wider organisational or systemic issue, or are otherwise considered to be in the public interest. Any grievances should be reported under our Grievance Policy.

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 raise a concern that you reasonably believe to be true and in the public interest that relates to wrongdoing such as:

- A criminal offence, for example fraud;
- the company is breaking the law or breaching regulatory obligations, 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;
- a serious or systemic failure to prevent sexual harassment, harassment, discrimination or other unlawful conduct.

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.

4. 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 keep your identity confidential wherever possible and only disclose it where necessary, and normally with your knowledge, unless required otherwise by law.

Alternatively, you may decide to raise a whistleblowing concern anonymously, although this can make the concerns raised more difficult to investigate.

All information will be handled sensitively and in line with data protection requirements.

We will take account of any individual needs when handling concerns, including where additional support or adjustments may be required.

5. 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, retaliation or victimisation (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern. Any form of retaliation, victimisation or detriment against a whistleblower will be treated as a disciplinary offence and will be dealt with under our disciplinary procedure.

We recognise that concerns relating to sexual harassment, discrimination, bullying or other inappropriate conduct can be particularly sensitive. Individuals raising such concerns, whether through this policy or another reporting route, will be treated with dignity and respect and provided with appropriate support. Retaliation against anyone who raises or participates in the investigation of such concerns will not be tolerated.

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. You will be protected even if your concern is not upheld, provided it was raised in good faith and with a reasonable belief.

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 may be treated as a disciplinary offence and 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.

6. 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 in the first instance. Or you can email the dedicated whistleblowing inbox SpeakUp@rhp.org.uk

It is important that you set out clearly:

- the details of the suspected wrongdoing including what has happened and when it occurred;
- the names of any individuals involved; and

- and what action (if any) you are seeking.

We will make reasonable adjustments where needed to support you to raise concerns, including providing information in accessible formats, translation services, or other appropriate support.

We encourage you to raise your whistleblowing concerns internally in the first instance. However, you have the right to report concerns directly to prescribed regulators and there may be circumstances where you may feel this is necessary e.g. if you feel that appropriate action has not been taken::

- 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 –RSM - via email suzanne.rowlett@rsmuk.com or via post at 25 Farringdon Street, London EC4A 4AB, or telephone 020 3201 8000; 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 020 7516 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 free, confidential whistleblowing advice: <https://protect-advice.org.uk/contact-us/>.

7. What will happen when we receive a whistleblowing report from you?

We take all whistleblowing concerns seriously. We will acknowledge your concern within 5 working days and carry out an initial assessment within 20 working days. 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. Where appropriate, external investigators may be appointed to ensure independence. If you are a colleague (including apprentices, trainees and agency workers), 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. Investigations will be conducted fairly, consistently and without discrimination. Steps will be taken to minimise bias and ensure decisions are evidence-based

Without breaching other areas of confidentiality, where possible the outcome of the investigation will be reported back to you.

8. 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 based on the seriousness of the concern, credibility of the information, and likelihood of confirming the issue. Anonymous reporting may limit our ability to investigate fully or provide feedback.

9. Speak Up Culture

We are committed to creating a culture where speaking up is encouraged and valued, and where individuals feel safe and supported to raise concerns.

10. Equality, Diversity and Inclusion

We are committed to ensuring this policy is applied fairly and consistently in line with the Equality Act 2010. We recognise that individuals may face different barriers to speaking up, including cultural, accessibility or confidence-related factors, and we will take steps to address these. We will make reasonable adjustments where required and ensure that all individuals feel safe, supported and able to raise concerns.

11. Legal, Governance and Oversight

This policy complies with the Public Interest Disclosure Act 1998, and is applied in line with the Equality Act 2010.

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

12. Monitoring and Review

This policy is owned by the Company Secretary and will be reviewed at least every two years or sooner if required by changes in legislation or regulation.

Date	Change Type	Description of Change	Approved by
31.03.2026	Minor update	Change of internal auditor details	CoSec
23.04.2026	Major revision	Updates for EDI, legal, governance and monitoring	ExCo/ARC/Board
26.6.26	Minor revision	Updates re sexual harassment	Board