



Committee Approver	Board
Stakeholder Consultation	<i>Executive Team, Leadership Team, Care Home Managers, JCC</i>
Date Approved	1 st July 2026
Classification	Policy
Title	Whistleblowing Policy
Revision Date	June 2026
Revised by	HRM
Next Revision Date	July 2029
Related Documents	• <i>Whistle Blowing Procedure</i> • <i>Code of Conduct for Governing Body Members</i> • <i>Code of Conduct for Staff</i> • <i>Disciplinary Procedure</i> • <i>Grievance Procedure</i> • <i>Complaints Policy</i> • <i>Anti-Fraud and Bribery Policy</i> • <i>Data Protection Policy</i> • <i>Notifiable Events Guidance</i> • <i>Equality, Diversity and Inclusion Policy</i> • <i>Dignity at Work Policy</i>
Location of Electronic Copy	..\..\Policies and Procedures Shared\Policies\Corporate

1. Viewpoint's Values

Viewpoint is committed to acting with honesty, integrity, openness and accountability in all that it does. These values underpin this policy and support a culture where staff, governing body members, workers, contractors and others connected with the organisation feel able to raise genuine concerns about wrongdoing, risk or malpractice without fear of disadvantage.

This policy supports a positive speaking-up culture and reflects Viewpoint's commitment to high standards of governance, ethical conduct and public accountability.

2. Policy Statement

Viewpoint recognises that whistleblowing is an important safeguard which helps protect the organisation, its tenants, service users, staff, governing body members and the wider public. It provides a route for concerns to be raised where there is a public interest in disclosing wrongdoing, malpractice, risk or improper conduct.

Viewpoint is committed to ensuring that concerns raised under this policy are taken seriously, handled appropriately, and considered promptly and fairly. Concerns will be treated as confidential so far as possible, and anyone raising a genuine concern under this policy will be protected from detriment or unfair dismissal in accordance with the law.

This policy is intended to support individuals who reasonably believe that wrongdoing is taking place, has taken place, or is likely to take place. It is not intended to replace normal day-to-day management, grievance, disciplinary, complaints or other procedures where those are more appropriate.

Where a concern raised under this policy also amounts to a notifiable event or requires referral to a regulator or prescribed person, Viewpoint will take the necessary steps in accordance with legal and regulatory requirements.

3. Aim

The aim of this policy is to:

- encourage a culture where genuine concerns can be raised openly and safely;
- provide a clear framework for raising concerns about wrongdoing, malpractice or risk in the public interest;
- ensure concerns are addressed consistently, fairly and promptly;
- protect individuals who make protected disclosures from detriment or unfair dismissal;
- support high standards of governance, accountability and ethical conduct across the organisation.

4. Legislation/related policies

This policy should be read alongside relevant legislation, regulation and internal policies.

The key legal framework includes:

- Public Interest Disclosure Act 1998;
- Employment Rights Act 2025;
- Equality Act 2010;
- Health and Safety at Work etc. Act 1974;
- Data Protection Act 2018;
- UK General Data Protection Regulation;
- *any other relevant employment, regulatory or safeguarding legislation.

Whistleblowing law protects workers who make protected disclosures in the public interest. Protected disclosures may relate to matters such as criminal offences, breaches of legal obligations, miscarriages of justice, risks to health and safety, damage to the environment, concealment of wrongdoing and, from 6 April 2026, disclosures relating to sexual harassment, where the statutory requirements are met.

*Relevant prescribed persons or bodies may include the Scottish Housing Regulator, the Care Inspectorate, the Health and Safety Executive, Police Scotland and others prescribed by law. The Scottish Housing Regulator's guidance on whistleblowing and notifiable events should also be considered where relevant.

5. Scope

This policy applies to:

- employees;
- workers;
- agency workers;
- apprentices;
- contractors and consultants working for or on behalf of Viewpoint;
- volunteers;
- trainees or students on placement;
- governing body members.

This policy applies where an individual raises a concern in the public interest about wrongdoing, malpractice, improper conduct, risk or other serious concerns connected to Viewpoint's activities.

This policy does **not** normally apply to personal employment complaints affecting only the individual, such as personal grievances, bullying complaints or dissatisfaction with management decisions, unless the matter has a wider public interest dimension. These matters should normally be dealt with under the appropriate policy or procedure.

6. Responsibilities

The following roles have specific responsibilities for supporting the effective operation of this policy and ensuring concerns are raised, handled and monitored appropriately.

Employees' responsibilities:

- familiarise themselves with this policy;
- raise genuine concerns promptly and in good faith through the appropriate channels;
- cooperate with any enquiries or investigations where required; maintain confidentiality appropriately; and
- not victimise or retaliate against anyone who raises a concern.

Line managers' responsibilities:

- create an environment where individuals feel able to speak up;
- take concerns seriously;
- respond promptly and sensitively;
- maintain confidentiality as far as possible; and escalate concerns in line with the appropriate procedure without delay.

HR responsibilities:

- provide advice and guidance on the application of this policy;
- support managers and employees during the process;
- help ensure concerns are handled fairly, consistently and in line with employment law and internal procedures; and
- support record-keeping, monitoring and policy review.

JCC responsibilities:

- contribute to consultation on the policy and any future review;
- help promote awareness and understanding of the policy among staff representatives; and
- raise any collective issues or feedback relevant to the operation of the policy through the appropriate channels.

Board/Committees responsibilities:

- provide oversight of the whistleblowing framework;
- receive assurance that concerns are managed appropriately;
- consider any significant trends, risks or lessons learned; and
- ensure this policy remains fit for purpose and aligned with governance and regulatory requirements.

7. Compliance & Support

An Equality Impact Assessment will be completed or reviewed in relation to this policy to consider whether the policy could have any adverse impact on any individual or group with protected characteristics.

8. Equality Impact Assessment (EIA)

A Privacy Impact Assessment will be completed where required to assess any data protection implications arising from the operation of this policy, including the handling of sensitive personal data and confidential information.

9. Monitoring & Evaluation

Viewpoint will monitor the effectiveness of this policy to ensure it is operating as intended and continues to reflect legal and regulatory requirements.

Whistleblowing matters may be reported in summary form to the relevant committee or governing body, subject to confidentiality and data protection requirements.

This policy will be reviewed on a 3year cycle, earlier if required due to legislative, regulatory or organisational change.