

# Whistleblowing Policy



**Lead Director:** Director of Governance & Assurance

**Reference:** POL 01

**Committee Approval:** Audit & Risk Committee  
22/04/26

**Review Date:** 22/04/29



## **1. Introduction and Aim**

- 1.1 Whistleblowing is the disclosure of suspected wrongdoing, risks, or dangers by anyone working for or associated with Cobalt Housing (Cobalt). This Policy, part of Cobalt's Governance Framework, ensures individuals can raise concerns in an open, safe, and supportive environment.
- 1.2 Cobalt is committed to integrity and acting in the public interest. We want people to feel confident to speak up when something is wrong. All concerns will be taken seriously, handled fairly, and individuals will be protected from any detriment for raising them.
- 1.3 The purpose of this Policy is to encourage individuals to report genuine concerns about actions, behaviours or practices connected to any aspect of Cobalt's work. This includes concerns about sexual harassment, which is recognised in law as a form of wrongdoing that can be raised through whistleblowing.
- 1.4 The Policy sets out clear routes for raising concerns, explains how disclosures will be managed, and outlines the protections available to those who speak up in the public interest.

## **2. Policy Statement**

### **2.1 Commitment to Speaking Up**

Cobalt is committed to the highest standards of integrity, openness and accountability. We aim to operate in line with legal and regulatory requirements and recognised good practice. We promote a culture where people can raise concerns about wrongdoing or risk without fear of disadvantage or retaliation.

### **2.2 Who the Policy Applies To**

This Policy applies to anyone working for or with Cobalt, including:

- Employees
- Casual, temporary, and agency workers
- Board and Committee Members
- Contractors, suppliers, and consultants
- Volunteers
- Customers or others with a relationship with Cobalt

All individuals raising concerns will be treated fairly and with respect.

### **2.3 Types of Concerns That Can Be Raised**

This Policy applies where an individual reasonably believes a serious concern is occurring or likely to occur, and raising it is in the public interest. Concerns may relate to:

- Financial malpractice, impropriety or fraud
- Bribery, collusion or negligence
- Breaches of legal or regulatory obligations
- Health and safety risks or environmental harm

- Theft or other criminal activity
- Improper conduct, unethical behaviour, or abuse of position
- Unauthorised disclosure or misuse of confidential information
- Breaches of Cobalt policies or procedures
- Attempts to conceal wrongdoing
- Sexual harassment

Concerns may relate to past, current, or potential future wrongdoing.

#### 2.4 **What This Policy Does Not Cover**

Some issues are better addressed through other procedures, including:

- Bullying or harassment (Dignity at Work Policy)
- Appeals against disciplinary decisions (Disciplinary Policy)
- Personal employment concerns or disputes (Grievance Policy)

#### 2.5 **Directing Concerns to the Appropriate Process**

Concerns raised under this Policy will be directed to the most appropriate procedure, and the recipient of the report will clearly explain when an issue is better handled through another route. While many matters can be resolved informally or through existing policies, this Policy is specifically for concerns raised in the public interest about potential wrongdoing or risk. Individuals will not be disadvantaged for raising a concern in good faith, even if it is initially made through the wrong process.

### **3. Policy Principles**

#### 3.1 **Duty to Speak Up**

Everyone working for or with Cobalt has a responsibility to raise concerns where they reasonably believe wrongdoing, risk, or misconduct may be occurring. Proof is not required; a reasonable belief that the information is substantially true is sufficient.

#### 3.2 **Protection and Support for Whistleblowers**

Cobalt is committed to ensuring individuals can raise concerns in good faith without fear of reprisal, and we encourage people to speak up as early as possible. Concerns may be raised verbally or in writing, and individuals should feel safe and supported throughout the process. All disclosures will be handled in line with legal requirements, regulatory expectations and best practice, as outlined in section 5.1.

#### 3.3 **Zero Tolerance for Victimisation**

Any attempt to deter someone from raising a concern, or any form of retaliation, will be treated as a serious disciplinary matter. This includes indirect or subtle behaviours.

### 3.4 **If You Experience Detriment**

Anyone who believes they have been treated unfairly for raising a concern should inform their line manager or the People Team immediately. Employees may also access confidential support through the Employee Assistance Programme.

### 3.5 **Relationship With Other Policies**

This Policy does not limit rights under other Cobalt policies. Concerns raised in good faith through the wrong route will be redirected appropriately.

### 3.6 **Concerns Raised Externally**

Where concerns are raised by individuals outside Cobalt, an external, independent investigation may be considered depending on the nature of the issue and an initial review.

### 3.7 **Good Faith**

Disclosures must be made honestly and with a genuine belief in their truth. No action will be taken against individuals whose concerns, raised in good faith, are not upheld.

#### **Confidentiality**

### 3.8 **Protecting Identity**

Cobalt will take all reasonable steps to protect the identity of anyone raising a concern. Confidentiality may only be overridden where required by law or where it would significantly impede a fair investigation.

### 3.9 **Respecting Confidentiality**

All parties must maintain confidentiality during and after an investigation. Misuse or breach of confidential information may result in disciplinary action.

### 3.10 **Data Protection**

Information will be handled in accordance with data protection legislation (including the UK GDPR) and in accordance with Cobalt's Data Protection Policy.

#### **Financial-Related Whistleblowing**

### 3.11 **Reporting Serious Financial Concerns**

In line with the Fraud, Corruption and Bribery Policy, the Chief Executive Officer must report any material adverse financial event (e.g. significant fraud over £5,000, impropriety, or major accounting failure) without delay to the:

- Chair of the Audit & Risk Committee
- Chair of the Board
- External Auditor

## **Safeguarding Arrangements**

### **3.12 Safeguarding Concerns**

Concerns about abuse or neglect should be reported in line with the Safeguarding Policy. Whistleblowing routes should be used where safeguarding concerns have not been acted upon appropriately.

## **Anonymous Allegations**

### **3.13 Anonymous Reporting**

Anonymous disclosures will be considered. When assessing them, Cobalt will consider the:

- seriousness of the issue
- credibility of the information
- likelihood of being able to verify the concern

## **Untrue Allegations**

### **3.14 Good Faith Protection**

No action will be taken where a concern raised in good faith is unsubstantiated. Deliberately false or malicious allegations made by employees may result in disciplinary action.

## **Making a Disclosure**

### **3.15 Internal Reporting Routes**

Employees should normally raise concerns with their line manager, who will notify the relevant Senior Management Team Member. If this is not appropriate, concerns may be raised with a Director or the Chief Executive Officer. All concerns will be treated confidentially.

### **3.16 Customers and Community Members**

Customers and community members may raise concerns through any employee, who will raise concerns with their line manager and the relevant Senior Team Member. Alternatively, a confidential mailbox may be used, details of which are provided at 3.19 and 3.20. The recipient will treat the matter confidentially and may redirect it to the Complaints Procedure if appropriate.

### **3.17 Fraud, Corruption and Bribery**

Concerns relating to fraud, corruption or bribery should be raised with a line manager, who will refer the matter to the Director of Governance and Assurance in their role as the Anti-Fraud Coordinator.

### **3.18 Concerns About Senior Leaders**

Concerns should be escalated as follows:

- Senior Management Team to the Chief Executive Officer
- Chief Executive Officer to the Chair of the Board
- Board Members to the Chair of the Board and Chief Executive Officer
- Deputy Chair to the Chair of the Board and Chief Executive Officer
- Chair of the Board to the Chair of the Audit & Risk Committee and Chief Executive Officer

### 3.19 Confidential Whistleblowing Mailbox

Individuals may use the confidential mailbox if they do not feel able to raise concerns through other routes:

[whistleblowing@cobalthousing.org.uk](mailto:whistleblowing@cobalthousing.org.uk)

### 3.20 Mailbox Oversight

The mailbox is accessed only by the Chair of the Audit & Risk Committee (in their role as the Whistleblowing Champion) and the Director of Governance and Assurance.

### 3.21 External Reporting

In exceptional or urgent circumstances, individuals may contact external bodies such as:

- The Police (criminal matters)
- Local authority safeguarding teams (abuse of vulnerable people)

Independent advice is available from:

- Protect (020 3117 2520)
- ACAS (0300 123 1100)

### 3.22 Board Members

Board Members with unresolved concerns about the Board or organisation should raise them formally with the Board, via the Director of Governance and Assurance.

### The Investigation

#### 3.23 Determining the Approach

The recipient of the disclosure, with advice from the People or Governance team where appropriate, will acknowledge receipt and determine how the concern should be investigated within five working days. This may involve internal investigation or referral to an external body. The Director of Governance and Assurance will notify the Regulator of Social Housing of serious allegations, e.g. fraud or regulatory breach.

#### 3.24 Conducting the Investigation

All disclosures will be considered carefully and investigated promptly, proportionately, and fairly, with respect for confidentiality and the rights of all parties.

### 3.25 **Timescales and Adjustments**

Following initial assessment, the investigating officer(s) will outline the approach and indicative timescale. Reasonable adjustments will be made in line with the Equality Act 2010.

### 3.26 **Outcomes**

Where wrongdoing is identified, appropriate action will be taken. This may include disciplinary action, process improvements, or referral to external authorities.

### 3.27 **Escalation to Prescribed Persons**

If dissatisfied with the outcome, whistleblowers may raise concerns with a “Prescribed Person” under the Public Interest Disclosure Act 1998. A current list is available at:

[www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies](http://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies)

### **Feedback**

### 3.28 **Keeping the Whistleblower Informed**

Cobalt will provide appropriate updates on actions taken, subject to confidentiality and legal constraints.

### 3.29 **Right of Reply**

Individuals who are the subject of a disclosure will be informed and given an opportunity to respond unless doing so would compromise the investigation.

### 3.30 **Escalation of Dissatisfaction/Appeal**

If dissatisfaction remains after internal processes are completed, concerns may be escalated to the Chair of the Audit & Risk Committee within ten working days of receiving the outcome. The Chair of the Audit & Risk Committee will acknowledge receipt and determine how the concern should be investigated within five working days.

### **Reporting**

### 3.31 **Internal Reporting**

A summary of the disclosure, investigation, and outcome of any whistleblowing will be reported to the Senior Management Team and the Audit & Risk Committee, and to the Board where appropriate.

### 3.32 **Regular Oversight**

A quarterly summary of whistleblowing disclosures and actions will be presented to the Audit & Risk Committee.

## Promotion of the Whistleblowing Policy

### 3.33 Awareness and Accessibility

Cobalt will ensure all employees, Board Members, and Committee Members are made aware of this Policy through induction and periodic training. The Policy will also be accessible to customers, contractors, and others via the Cobalt website.

## 4. Risk Management

4.1 The key risk associated with non-delivery of this Policy is:

Risk Register Ref:	Risk:
<p><b>GOV 15 – Whistleblowing Risk</b></p> <p>There is a risk that people are unable to raise serious concerns about fraud, misconduct or wrongdoing if there are no appropriate processes in place to do so.</p>	<ul style="list-style-type: none"> <li>• Failure to identify wrongdoing early</li> <li>• Detriment or victimisation of whistleblowers</li> <li>• Non-compliance with the Employment Rights Act 2025</li> <li>• Poor organisational culture and reduced psychological safety</li> <li>• Reputational damage</li> <li>• Regulatory non-compliance and governance failure</li> <li>• Ineffective investigations</li> <li>• Lack of awareness of whistleblowing routes</li> <li>• Data protection breaches during investigations</li> </ul>
Risk Consequences:	Management and Mitigation:
<ul style="list-style-type: none"> <li>• Misconduct, fraud, safeguarding issues, or sexual harassment go undetected</li> <li>• Issues escalate, causing greater harm</li> <li>• Increased financial loss or operational disruption</li> <li>• Legal claims for detriment or unfair dismissal</li> <li>• Breach of Employment Rights Act 1996 (as amended by the 2025 Act)</li> <li>• Loss of trust and reduced willingness to speak up</li> <li>• Failure to protect disclosures about sexual harassment</li> <li>• Legal challenge or tribunal claims</li> <li>• Regulatory criticism for inadequate protections</li> <li>• Staff fear raising concerns</li> <li>• Increased risk of cover-ups or silence</li> <li>• Declining employee engagement and retention</li> <li>• Public criticism for failing to act on concerns</li> </ul>	<ul style="list-style-type: none"> <li>• Clear reporting routes and confidential mailbox</li> <li>• Regular promotion and training</li> <li>• Strong oversight by Whistleblowing Champion and Audit &amp; Risk Committee</li> <li>• Explicit non-retaliation commitments</li> <li>• Manager training on handling disclosures</li> <li>• Monitoring of whistleblower treatment and follow-up support</li> <li>• Policy updated to include sexual harassment as a protected disclosure</li> <li>• Staff and manager training on new legal requirements</li> <li>• Regular policy review cycle</li> <li>• Visible leadership commitment to speaking up</li> <li>• Regular communication reinforcing openness</li> <li>• Integration with culture, values, and HR policies</li> <li>• Transparent reporting to SMT, Audit &amp; Risk Committee, and Board</li> <li>• Prompt investigation and action on concerns</li> <li>• Clear escalation routes to prescribed persons</li> <li>• Quarterly reporting to Audit &amp; Risk Committee</li> <li>• Annual review of whistleblowing arrangements</li> </ul>

<ul style="list-style-type: none"> <li>• Loss of stakeholder confidence (tenants, regulators, partners)</li> <li>• Media scrutiny if issues escalate</li> <li>• Negative regulatory judgement (e.g., governance downgrade)</li> <li>• Increased scrutiny from the Regulator of Social Housing</li> <li>• Weak assurance environment</li> <li>• Inconsistent handling of concerns</li> <li>• Perceived unfairness or bias</li> <li>• Loss of trust in the process</li> <li>• Staff, tenants, and contractors unsure how to raise concerns</li> <li>• Concerns raised through inappropriate channels or not raised at all</li> <li>• Mishandling of sensitive information</li> <li>• Breach of UK GDPR</li> <li>• Loss of trust and potential ICO action</li> </ul>	<ul style="list-style-type: none"> <li>• Strong links with fraud, safeguarding, and complaints frameworks</li> <li>• Clear investigation procedures</li> <li>• Training for investigating officers</li> <li>• Option for external investigation where appropriate</li> <li>• Induction and refresher training</li> <li>• Policy published on website</li> <li>• Regular internal communications and reminders</li> <li>• Clear confidentiality commitments</li> <li>• Controlled access to whistleblowing mailbox</li> <li>• Training on secure handling of investigation data</li> </ul>
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### Key Risk Indicators and Control Limits

#### 4.2 Key Risk Indicators

Key risk indicators (KRIs) for this Policy will be reported to the Audit & Risk Committee at each meeting, and to the Board where appropriate, as part of Cobalt’s assurance framework. KRIs will be monitored even when numbers are low, as trends and patterns are as important as volume.

The following indicators will be tracked:

- **Number of Whistleblowing concerns raised**  
(including whether they relate to fraud, safeguarding, sexual harassment, or other categories of wrongdoing)
- **Time taken to acknowledge and investigate concerns**  
(measured against agreed timescales, and any delays explained)
- **Themes and trends arising from disclosures**  
(including repeat issues, hotspots, or systemic risks)
- **Outcomes of investigations**  
(substantiated or unsubstantiated findings, improvements made, referrals to external bodies)
- **Any reported detriment to whistleblowers**  
(including actions taken to address or prevent recurrence)

These indicators support early identification of cultural, operational, or governance risks and provide assurance that the Policy is operating effectively.

## 5. Regulatory & Legislative Compliance

### 5.1 Legal Protection for Whistleblowers

The Public Interest Disclosure Act 1998 (PIDA) protects workers who raise concerns about wrongdoing in the public interest. Individuals making a protected disclosure must not be dismissed, penalised, or subjected to any detriment for speaking up.

A protected disclosure is one where the individual reasonably believes the information shows wrongdoing such as a criminal offence, breach of legal obligation, health and safety risk, environmental damage, or attempts to conceal such wrongdoing.

From 6 April 2026, the Employment Rights Act 2025 extends these protections by explicitly recognising sexual harassment as a form of wrongdoing that can be raised through whistleblowing. Workers who disclose concerns about sexual harassment in the public interest are legally protected from detriment and unfair dismissal.

## 6. Links to Other Key Documents

- Dignity at Work Policy
- Equality and Diversity Policy
- Disciplinary Policy
- Grievance Policy
- Fraud, Corruption and Bribery Policy
- Safeguarding Policy
- Data Protection Policy
- Board Member Dispute and Grievance Policy
- Board Member Disciplinary Policy
- Code of Conduct
- Complaints Policy
- [Public Interest Disclosure Act 1998](#)

## 7. Governance of this Policy

### Equality Diversity & Inclusion (ED&I)

- An Equality Impact Assessment (EQIA) was completed on 26<sup>th</sup> February 2021 identified no adverse discrimination.
- The Policy strengthens Cobalt's commitment to a safe, fair, and inclusive environment for all employee, customers, contractors and stakeholders.
- It reinforces protection for individuals who may be disproportionately affected by wrongdoing, discrimination, harassment, or abuse.
- The inclusion of the Employment Rights Act 2025 ensures that sexual harassment disclosures are explicitly recognised as whistleblowing concerns.
- A clear and supportive whistleblowing process encourages people from all backgrounds to speak up without fear of retaliation.

	<ul style="list-style-type: none"> <li>• The Policy commits to making reasonable adjustments during investigations, ensuring individuals with disabilities or health conditions are not disadvantaged.</li> <li>• Use of plain, inclusive language and multiple reporting routes improves accessibility for diverse groups.</li> <li>• Strengthened protections against detriment reduce the risk of unfair treatment, particularly for marginalised or under-represented groups.</li> <li>• A robust whistleblowing framework contributes positively to organisational culture and inclusion.</li> <li>• No negative EDI impacts were identified; the Policy is expected to have a positive impact on equality, diversity, and inclusion across Cobalt.</li> </ul>
<b>Financial and Links to VfM</b>	<ul style="list-style-type: none"> <li>• Strengthens internal controls by enabling early detection of wrongdoing.</li> <li>• Supports regulatory expectations around integrity, accountability, and organisational culture.</li> <li>• Ensures clear oversight through regular reporting to SMT, the Audit &amp; Risk Committee, and the Board.</li> <li>• Reduces the risk of governance failure or regulatory downgrade.</li> <li>• Helps prevent financial loss by identifying fraud, corruption, or mismanagement at an early stage.</li> <li>• Minimises costs by preventing unresolved risks from escalating into major incidents.</li> <li>• Promotes responsible use of public funds and customer rents.</li> <li>• Avoids unnecessary expenditure by addressing issues before they become costly.</li> <li>• Improves operational efficiency through early intervention and learning from emerging trends.</li> <li>• Reinforces ethical, transparent decision-making, supporting long-term organisational resilience and value for money.</li> </ul>
<b>Privacy and Data Protection</b>	<ul style="list-style-type: none"> <li>• The Policy involves handling sensitive personal data – such as allegations, witness statements and investigation records - which must be processed lawfully under UK GDPR.</li> <li>• Strict confidentiality controls are required to prevent unauthorised access or disclosure of whistleblowing information.</li> <li>• Investigation records must be stored securely, with restricted access and defined retention periods, to minimise the risk of data breaches.</li> <li>• Whistleblowers’ identities must be protected wherever possible and only shared where legally required or essential for a fair investigation.</li> <li>• The confidential whistleblowing mailbox must be managed in line with data protection principles, ensuring secure transmission and storage of information.</li> <li>• Individuals involved in investigations must understand their responsibilities for data minimisation, accuracy, and secure handling of personal data.</li> <li>• Failure to comply with data protection requirements could lead to regulatory action, reputational damage, and loss of trust from staff and customers.</li> </ul>
<b>Health and Safety</b>	<ul style="list-style-type: none"> <li>• The Policy supports early reporting of health and safety risks, helping prevent accidents, injuries, or unsafe working conditions.</li> </ul>

<b>Development and Consultation</b>	<ul style="list-style-type: none"> <li>• It provides a safe route for staff, contractors, and customers to raise concerns about unsafe practices without fear of reprisal.</li> <li>• Early identification of hazards reduces the likelihood of serious incidents and supports compliance with health and safety legislation.</li> <li>• Trends in whistleblowing reports can highlight systemic safety issues requiring organisational action.</li> <li>• Protecting whistleblowers from detriment encourages a culture where people feel confident to speak up about safety concerns.</li> <li>• Failure to implement the Policy effectively could lead to unreported risks, increased incidents, and potential regulatory enforcement.</li> </ul>
	Not applicable for this Policy

## 8. Definitions

### 8.1 Whistleblower

A *whistleblower* is any individual who raises a concern under this Policy. This includes employees, workers, Board or Committee Members, contractors, suppliers, volunteers, customers, or any other person associated with Cobalt who reasonably believes that wrongdoing, risk or misconduct may be taking place.

### 8.2 Disclosure

A *disclosure* is information that an individual reasonably believes indicates wrongdoing, risk, or danger connected to the workplace. This may relate to the actions of Cobalt, its employees, contractors, Board Members, or third parties, and may concern past, current, or potential future wrongdoing. Examples include (but are not limited to):

- Criminal offences
- Breaches of legal or regulatory obligations
- Health and safety risks
- Environmental damage
- Financial malpractice or fraud
- Improper conduct or unethical behaviour
- Misuse of confidential information
- Attempts to conceal wrongdoing
- Sexual harassment

A disclosure does not require proof; a reasonable belief that the information is substantially true is sufficient.

