

July 2023

**Sanctuary Scotland Housing Association Limited**

**Mapping Exercise for Assurance Statement – Whistleblowing**

The purpose of this document is to provide the Board of Management of Sanctuary Scotland Housing Association Limited with assurance that the organisation complies with the requirements of Chapter Three of the Regulation of Social Housing in Scotland in relation to Whistleblowing. The compliance requirements are defined, the evidence and practice to support compliance is described and additional information or further action defined.

WHISTLEBLOWING – Chapter Three of the Regulation in Social Housing framework states: Have effective arrangements and a policy for whistleblowing by staff and governing body/elected members which it makes easily available and which it promotes		
Evidence	Compliant	Action required/commentary
<p><b><u>Policy and Procedure</u></b> Whistleblowing policy Whistleblowing procedure – the procedure contains a clear 4 step process for employees to follow</p> <p>The policy and procedure is reviewed annually by the Group Audit and Risk Committee</p> <p><b><u>Associated documents</u></b> The staff handbook – this contains information on whistleblowing and refers to policy and procedure and where to get further information Grievance policy and procedure Management of Fraud Risk and Reported Frauds Bullying and Harassment Prevention of Bribery Codes of conduct for Board members – Sanctuary Group, National Federation of Housing Associations, Scottish Federation of Housing Associations</p> <p><b><u>Board of Management members</u></b></p>	<p>YES</p>	<p>Whistleblowing Policy and Procedure updated in September 2022</p> <p>In terms of training, whistleblowing is covered in Core Essentials which all staff have to undertake every two years. This is tracked and shows on compliance reports</p> <p>Policies (sharepoint.com) SuccessFactors Learning: Content Player for Core Essentials (e-Learning) (plateau.com)</p> <p>At the meeting of the National Residents Review Panel on 30 March 2022, panel members</p>

<p>The governance manual contains the Whistleblowing policy and procedure – the governance manual is updated and circulated at least once per year The governance manual including Whistleblowing is part of the induction programme for new board members Board members</p> <p><b><u>Staff</u></b> The Whistleblowing policy and procedure is easily available on SOLIS (intranet) The staff handbook is easily available on SOLIS</p> <p>Whistleblowing is covered in the core essentials e-learning for all new starters, the new training session concentrates on the essential issues.</p> <p><b><u>Culture – What tells us our culture is open and transparent and give staff the right environment to feel that they can highlight areas of concern</u></b> Core Values Core Behaviours My Performance IIP (the outcomes tell us that staff feel supported and have good working relationships with their line managers, management team and their colleagues) Senior Management team monthly meeting Team meetings SOLIS gives our staff information on all policies and procedures easily available HR Business partner and HR Business Managers – separate source to consult on concerns Health Assured – free, confidential 24 hour telephone line service for staff to get advice on a range of matters including employment concerns Health matters – portal giving advice and support on work and health matters.</p> <p>A Group whistleblowing mailbox has now been set up and a Contact in Confidence mailbox is available for Sanctuary Care.</p>		<p>discussed the Whistleblowing – Group Procedure and considered the whistleblowing mapping exercise for the Assurance Statement.</p> <p>The measures for staff which are now in place were discussed with the Review Panel who were satisfied that issues raised in last two years in relation to raising whistleblowing issues have now been addressed.</p> <p>The Review Panel discussed a whistleblowing scenario and suggested the undernoted be considered at future policy and procedure reviews:</p> <ul style="list-style-type: none"> <li>• External investigators are engaged when senior managers are the subject of a whistleblower.</li> <li>• The Review Panel stated that no part of the internal process, including the responsibility to provide feedback should be by-passed.</li> <li>• The Review Panel asked that feedback to the whistleblower be provided in writing.</li> <li>• Apart from the suggestion to use an external source for the investigation of the most senior managers, the Review Panel re-iterated that irrespective of position the policy and procedure must apply to all employees.</li> </ul>
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<p>A dedicated whistleblowing phone line has now been provided. There is a new form available that can be used anonymously to raise whistleblowing issues that auto-forwards to the Group or Sanctuary Care mailboxes. The mailboxes are monitored by Group HR on a daily basis, with messages responded to within four days, where a response is requested. In exceptional circumstances where employees prefer to raise a concern with an external agency advice is available.</p>		
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