

# **Newlon Housing Trust Whistleblowing and Public Interest Disclosure Procedure for Suppliers**

**Version: 2.2**

**Document owner: Assistant Director Governance and Assurance**

**See also: Group Whistle-blowing/Public Interest Disclosure Policy, Trust Whistle-blowing/ Public Interest Disclosure Procedure for Staff**

**Date last reviewed: December 2022**

**Date due for next review: December 2024**

This Policy will be applied in a way that will not discriminate on the grounds of the race, gender, marital status, disability, sexual orientation, religion or belief, pregnancy or maternity status, gender reassignment, or age of the employee concerned. It applies to all staff

<b>Version number</b>	<b>Amendment</b>	<b>Amended by</b>	<b>Date</b>
1.1	Owner changed from Barbara Duff to Surjit Dhande.	Joe Molloson	19/04/2018
1.2	Company secretary amended to be Surjit Dhande.	Joe Molloson	19/04/2018
1.3	Owner and Company Secretary amended to Glenn D	Kieran Hurley	22/01/2020
1.4	Title changed to Newlon Housing Trust not just Trust and review date changed to January 2021 to reflect that policy was reviewed in January 2020.	Joe Molloson	16/10/2020
2.0	Full review – no updates	Kieran Hurley	15/03/2021
2.1	Excluded the name of the Group Company Secretary	Cristina Jandic	15/10/2021
2.2	Extended date of the policy as all remains relevant	Cristina Jandic	20/12/2022

## 1. Introduction

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- Newlon is committed to the highest standards of probity and legality. This procedure tells you how to raise a concern if you believe that Newlon, someone within Newlon or someone from another organisation in the Newlon Group is doing something that undermines these standards (see section 2).
- This procedure does not cover grievances or private disputes between you and your company's internal employees, operations and practices or between you and Newlon. These concerns should be dealt with formally through your company's normal reporting channels, policies or procedures.

## 2. Concerns you should report

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You should report a concern where you reasonably believe any one or more of the following matters has, may have or will take place:

- A criminal offence.
- Corruption or bribery.
- A misuse of public funds.
- A failure to meet a regulatory requirement.
- A danger to the health and safety of an individual.
- The abuse of a vulnerable person.
- A breach of the Data Protection Act.
- An incidence of slavery or human trafficking.
- A deliberate concealment of any of the above.

## 3. Procedure for reporting a concern

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- Newlon recognises that, due to the potential sensitivity of the situation, you may not always feel comfortable discussing concerns with your usual contact person. Newlon's guidance for suppliers is that, as soon as you become aware of any suspected wrongdoing, you should notify the matter to the Group Company Secretary/Governance Manager.
- If your evidence implicates a Director or the Group Chief Executive you should approach the Chair of the Audit and Risk Committee:

**Fred Angole**

Tel: 07721 977 830 Email: [okao\\_angole@hotmail.com](mailto:okao_angole@hotmail.com)

- If it is not possible to resolve your concern via these contacts you may need to present your evidence to a relevant external agency or regulator. For further details of these agencies please refer to the Newlon Group Whistle-blowing/Public Disclosure Policy.
- If you have any questions about the content or application of this procedure please contact the Group Company Secretary/Governance Manager.
- If after raising your concern internally you feel under threat of victimisation or if you feel that you cannot raise your concern because you believe that you may be subject to victimisation, or that evidence will be destroyed or concealed, then you can also make a protected disclosure.

<b>You can make a protected disclosure to:</b>	<ul style="list-style-type: none"> <li>• A legal advisor.</li> <li>• A prescribed body, agency or regulator, as set out in the Group Policy.</li> <li>• An individual unconnected with the organisation.</li> </ul>
<b>You can get confidential advice by contacting:</b>	<ul style="list-style-type: none"> <li>• Public Concern at Work. For more information see their website <a href="http://www.pcaaw.co.uk">www.pcaaw.co.uk</a></li> </ul>

#### 4. Investigating a reported concern

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- All concerns will be investigated carefully and thoroughly as set out in the Group Whistleblowing and Public Disclosure Policy. Anybody raising concerns, and anybody implicated by those concerns, will be treated fairly and equitably.
- Where possible, Newlon will let you know of the results of any investigation and about any action which is proposed.
- Suppliers can be confident that reporting a concern will not have a negative impact on the delivery of your service or ability to secure contracts from Newlon in the future. This will also be the case if someone comes forward in good faith and their concern turns out later not to have been justified.
- Suppliers will be entitled to the same protection as Newlon employees under the Public Disclosure Act 1998 against victimisation and reprisals for making certain kinds of disclosure. Furthermore, it is a disciplinary offence for any member of Newlon staff to try to prevent or discourage a supplier from coming forward to express a serious concern.
- Anonymous disclosures are discouraged and will only be considered at the discretion of the investigating officer. In exercising this discretion, the factors likely to be taken into account would include:
  - Whether the disclosure can be independently verified.
  - The seriousness of the issue raised.

#### 5. Conduct of suppliers

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- You must make any disclosures in good faith, in the reasonable belief that the allegations are substantially true. You must not make a disclosure for personal gain. Any deliberately false or malicious allegation will be treated seriously and could result in legal action.