



**Drumchapel
Housing**

Co-operative Limited

WHISTLEBLOWING POLICY

Board Approval FEBRUARY 2026

Next Review Date: FEBRUARY 2029

1. Introduction

- 1.1 Drumchapel Housing Co-operative Limited (the Co-operative) is committed to the highest standards of openness, probity and accountability. As employees are often the first to realise that there may be something seriously wrong, the Co-operative would encourage and expect employees who have serious concerns about any aspect of the Co-operative's work to come forward and speak up without fear of reprisal.
- 1.2 Therefore, the Co-operative recognises that it is an important aspect of accountability and transparency to provide a mechanism to ensure that no employee, of the Co-operative feels at a disadvantage in raising legitimate concerns.
- 1.3 The Public Interest Disclosure Act, 1998, gives legal protection to employees against being dismissed or penalised by their employers as a result of making a protected disclosure (whistleblowing).
- 1.4 Concerns which are raised through whistleblowing must be made in the 'public interest' which means that the concerns must affect others such as the public or other stakeholders.
- 1.5 Concerns which are not in the public interest will normally be dealt with through the grievance policy. If you are unsure which policy is appropriate to raise your concerns, please contact your line manager to discuss.
- 1.6 All employees and workers are covered by this policy.
- 1.7 This policy has been adopted from EVH Model Policy dated July 2025.
- 1.8 This policy does not form part of your contract of employment, therefore may be updated or withdrawn at any time. If this happens it will be communicated to you accordingly.

2. Scope of Policy

- 2.1 This policy is designed to enable employees to raise concerns internally at a senior level to disclose information that the individual believes shows malpractice or impropriety. This policy is intended to cover concerns that are in the public interest and may (at least initially) be investigated separately but may lead to the instigation of other procedures. These concerns might include:
 - Financial malpractice, impropriety or fraud
 - Failure to comply with a legal obligation or Statutes
 - Dangers to health and safety or the environment
 - Criminal activity involving DHCL, its staff, governing body member or stakeholders
 - Professional malpractice
 - Improper conduct or unethical behaviour
 - Failure to meet legal obligations
 - Abuse of power or status
 - Deliberate attempts to conceal any of the above

3. Legal Framework

- Public Interest Disclosure Act 1998, Sections 19 and 20
- Enterprise & Regulatory Act 2013

4. Equality and Human Rights

4.1 The co-operative promotes Equality and Human Rights within everything it sets out to achieve. The Policy has two main aims:

- to ensure that no person, group of persons or organisation who deal with the Co-operative in any way or who requires a service, assistance or advice from the Co-operative, or who is employed by (or serves) in any capacity by the Co-operative, is treated less favourably than any other person, group of persons or organisation – put more simply, anyone who has any sort of contact with Drumchapel Housing Co-operative Limited.
- To promote the Policy so that anyone dealing with the Co-operative in any capacity is made aware that the Co-operative has a Policy and that there is a zero tolerance of any act which contravenes the Policy or its principles in any way.

4.2 As recommended by the Equality and Human Rights Commission a screening process was applied to this policy, an impact assessment has been completed at Appendix 2.

5. Safeguards

5.1 Protection

This policy is designed to offer protection to employees who disclose serious concerns, provided the disclosure is made:

- In the public interest.
- To an appropriate person/body.
- That the individual has reasonable belief in the validity of the concerns being raised.

5.2 The Co-operative will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect the individual when they raise a concern which complies with the above points.

6. Confidentiality

6.1 All concerns will be treated in confidence, and every effort will be made not to reveal the individual's identity if they so wish. However, at the appropriate time the individual may need to come forward as a witness. If we need to disclose your identity to anyone, we will ensure that you are notified of this in advance.

7. Anonymous Allegations

7.1 This policy encourages individuals to put their names to any disclosures they make. Concerns expressed anonymously are more difficult to investigate, however may be considered at the discretion of the Co-operative.

8. Untrue Allegations

- 8.1 If an individual makes an allegation that is not confirmed by the subsequent investigation, it is probable that no action will be taken against them.
- 8.2 However, if the individual makes an allegation that is deemed to be made 'in bad faith' i.e. frivolously, maliciously or for personal gain, disciplinary action may be taken against them, and this may be up to and including dismissal.

9. Raising a Concern

9.1 First Step

- 9.2 The individual should raise concerns with their immediate line manager. This information will be passed on as soon possible to the Director.
- 9.3. Any complaints will be investigated by the Director unless the complaint is against the Director or is in any way related to their actions. Where the complaint is related to the Director, it should be addressed to the Chairperson of the Management Board who will in turn appoint an independent person to investigate the allegations.
- 9.4 Although the individual is not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate that there are reasonable grounds for their concern.
- 9.5 The earlier the individual expresses their concern, the easier it is to action. The amount of contact between the persons considering the issues and the individual will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, the Co-operative will seek further information from the individual concerned.
- 9.6 Where any meeting is arranged with the individual that raised the concerns, they can be accompanied by a trade union representative, and the meeting can be held off-site if they so wish.
- 9.7 Information for potential whistleblowers can also be found on the Scottish Housing Regulators website here: <https://www.housingregulator.gov.scot/for-landlords/advisory-guidance/how-we-work/information-about-whistleblowing/>

10. Process

- 10.1 On receipt of a disclosure the following process will be followed:
- The disclosure will be considered, and, if appropriate, a meeting will be arranged with the individual who raised the concerns to gather initial information.
 - Further to this meeting, if appropriate, an independent investigator will be appointed to take forward an investigation into the concerns raised.
 - The individual who raised the concerns will be provided with an update and a likely timescale on when they will receive a final response.
 - Once the investigation is complete a report will be provided to the individual who instructed the investigation.
 - The report will be considered, and appropriate actions will be taken.
 - A final outcome will be provided to the individual who raised the concerns.

- 10.2 Depending on the outcome of the investigation appropriate action will be considered in accordance with the Co-operatives existing policies and procedures.

11 Outcome of Investigation

- 11.1 Once the investigation has been completed and the report is received by the Chairperson, a decision on what action to take will be considered. If there are reasonable grounds to substantiate the complaint, an appropriate procedure will be initiated. This may also include referral to an external body or regulator.

12 Right of Appeal

- 12.1 Where an individual feels that their concern has not been dealt with appropriately, they can appeal the decision internally to the Chair of the Audit and Staffing Sub-Committee (who should not be an office bearer).

13 Raising a Concern Externally

- 13.1 The Co-operative encourages employees to raise concerns internally to allow for appropriate investigation and action to be taken, however if an employee remains dissatisfied with the outcome, they can raise this with the correct prescribed body or person. (Appendix 1)

14 General Data Protection Regulations:

- 14.1 The organisation will treat your personal data in line with our obligations under the current data protection regulations and our own Data Protection Policy. Information regarding how your data will be used and the basis for processing your data is provided in the Co-operative's employee privacy notice.

15 Policy Review

- 15.1 This policy will be reviewed every 3 years or sooner if required by legal, regulatory or best practice requirements.

Appendix 1

List of Prescribed Persons

- **Scottish Housing Regulator** Our lead officer for Drumchapel Housing Co-operative Ltd is Stephen Lalley, Regulation Manager

Tel: 07880465794

Email: stephen.lalley@shr.gov.scot

- **Environmental Health**

<https://citizen.glascc1-prd.gosshosted.com/1289>

<https://www.glasgow.gov.uk/article/4968/Environmental-Health>

- **Health and Safety Executive**

Insert appropriate contact details

<https://www.hse.gov.uk/>

<https://www.hse.gov.uk/contact/index.htm>

Tel: 0300 003 1747

A list of prescribed persons / bodies can be found at this link - [Whistleblowing: list of prescribed people and bodies - GOV.UK](#)

Further Sources of Information

- **ACAS**

Helpline: 08457 47 47 47

www.acas.org.uk

- **Protect**

Tel (general): 020 3117 2520

- **Unite Trade Union**

Tel: 0141 404 5424

Email: Billy.Thomson@unitetheunion.org

- **Citizen's Advice**

<https://www.citizensadvice.org.uk/>

Appendix 2 Equality Impact Assessment