

Whistleblowing Policy

This policy sets out Bromford Flagship LiveWest’s (‘the Group’) approach to addressing whistleblowing in support of delivering safe, fair, and responsive services to our colleagues and customers. It is underpinned by legal duties, regulatory expectations, and a commitment to fairness, accountability, and transparency.

Department	Risk
Policy Owner	Group Insurance and Financial Crime Manager
Approved Date	February 2026
Date for Review	February 2028
Approving Body	Audit and Risk Committee
Associated Legislation/Regulation	Public Interest Disclosure Act 1998
Legal Advice From	None required
Equality Impact Assessment Date	20 January 2026
Version Number	1.0
Publication Status	External

1. Purpose / Principles

The Group is committed to operating ethically, honestly, and to the highest standards of openness, transparency, accountability, and governance. We aim to foster a culture that promotes high standards of conduct and governance across all our activities. However, we recognise that on occasion malpractice, illegal practices, or wrongdoing may occur.

Colleagues are often best placed to identify situations where the interests of colleagues, customers, or the wider public may be at risk. The purpose of this policy is to ensure colleagues feel confident and protected to raise genuine concerns or suspicions of wrongdoing at an early stage.

This policy provides a clear and safe mechanism for raising concerns about wrongdoing that may fall outside the scope of other Group policies, such as the grievance procedure or any relevant Health & Safety policies.

2. Scope

This policy applies to all Group colleagues and to anyone working for, or on behalf of, the Group. This includes individuals and organisations with whom the Group has a business relationship.

All colleagues are expected to remain alert to potential wrongdoing. This includes concerns they witness directly, or issues that are raised with them by others.

Third parties who provide services to the Group are encouraged to raise concerns using whistleblowing arrangements. However, legal protection under the Public Interest Disclosure Act 1998 does not apply to third parties.

Whistleblowing concerns raised externally to the Group will be considered on a case-by-case basis and investigated as appropriate.

The principles set out in this policy apply to whistleblowing procedures currently in place within legacy organisations until a single Group whistleblowing procedure is formally approved.

3. Roles / Responsibilities

Board has overall responsibility for this policy.

The Board delegate responsibility for this to the Audit & Risk Committee (ARC). ARC has responsibility for the following:

- Reviewing this policy to ensure its continued relevance and effectiveness
- Responsibility for reviewing the policy, making recommendations to the Board, and maintaining oversight of risk management and internal control processes.

Executive Disclosure Committee (EDC) and Risk and Regulation Group (RRG) are responsible for the following:

- Reviewing periodic reports, related management information, and monitoring progress as submitted by the Group Insurance and Financial Crime Manager

The Group Insurance and Financial Crime Manager is responsible for:

- Overall responsibility for the coordination and execution of all whistleblowing activities across the Group
- Leading the delivery and communication of whistleblowing activities
- Providing cyclical reports, related management information, and updates on progress

All colleagues are responsible for the following:

- Act in accordance with the principles outlined in this policy
- Demonstrate the Group's values and behaviours consistently in their day-to-day activities
- Report immediately any suspicions or evidence of irregular, improper, or behaviours
- Exercise propriety and accountability in the use of the Group's resources, including the handling of funds and interactions with contractors, suppliers, and customers

4. Policy Content

What is a whistleblower?

A whistleblower is a colleague who raises a concern because they believe they are acting in the public interest. This usually involves sharing information that suggests wrongdoing may have occurred, is occurring, or is likely to occur. In doing so, the colleague is making a disclosure.

The wrongdoing raised must be believed to be in the public interest. This means it must affect others, such as colleagues, customers, or the wider public.

Where a colleague raises a concern that meets the public interest test, they are considered a whistleblower and are protected by law under the Public Interest Disclosure Act 1998. This protection means that a whistleblower should not be treated unfairly or dismissed because of raising a concern.

A colleague can raise a whistleblowing concern at any time. This includes concerns about incidents that have happened in the past, are happening now, or are believed to be likely to happen in the future.

The 'public interest'

A whistleblower is protected by law if they raise concerns for any of the following:

- A crime has been or is likely to be committed.
- A person has failed or is likely to fail to comply with any legal obligation to which they are subject.
- A miscarriage of justice has occurred or is likely to occur.
- The health and safety of any individual have been or is likely to be endangered.
- The environment has been or is likely to be damaged.
- A cover up of any of the above.

Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law, unless the case is in the public interest. The colleague will need to refer

to the grievance procedure and bullying, harassment and respect procedure as relevant. The Group's anonymous whistleblowing system does also allow for grievances to be shared through this route; these would be passed to the HR Services team for the grievance procedure to be applied.

Legal considerations

Whistleblowers have legal protection under the Public Interest Disclosure Act 1998. To benefit from this legal protection, a colleague must:

- Reasonably believe that the disclosed information is true.
- Reasonably believe that wrongdoing has happened or is likely to happen.

No formal disciplinary action will be taken against a colleague if they have raised a concern, even if this is not confirmed by any subsequent investigation, if the colleague had a 'reasonable belief' that serious malpractice has taken place or is currently taking place or is likely to take place.

Malicious allegations in the absence of a 'reasonable belief' could result in disciplinary action being taken.

Who to tell and what to expect

We strongly encourage colleagues to raise concerns at the earliest opportunity. Details of how to do this are set out in the relevant organisation's Whistleblowing Procedure.

If a colleague does not feel able to raise a concern directly with the Group, there are other options available. These include reporting the matter in confidence via the Group's external whistleblowing helpline, seeking independent legal advice from a lawyer, contacting Protect (the UK whistleblowing charity), or making a disclosure to a prescribed person or body.

The Regulator of Social Housing (RSH) is a prescribed person. Prescribed persons provide an independent route for colleagues to make a public interest disclosure where they do not feel able to raise the concern directly with the Group, or where a disclosure has been made and the Group has failed to act.

Any disclosure made to a prescribed person or body must be to one that is responsible for the issue being raised. For example, a concern relating to wrongdoing in connection with a colleague's duties may be raised with the RSH.

What we will do

We will listen carefully to a colleague's concern. Where necessary, the colleague may be asked to provide further information to help inform decision-making.

A colleague should tell us straight away if they do not want others to know that they have raised a concern. Disclosures made under this policy will be managed in a confidential and sensitive manner, as far as reasonably practicable. Where confidentiality cannot be maintained, for example due to the nature of the concern or the level of investigation required, the reasons will be explained.

While colleagues will not be involved in deciding how a concern is managed, those who raise concerns will be kept informed of progress. Details of any investigation will remain confidential.

Protecting a whistleblower

To encourage colleagues to raise concerns in confidence and without fear of retaliation, the Group will take all reasonable steps to protect individuals who make disclosures from victimisation, bullying, or any other form of detriment.

Victimisation, bullying, or any other action intended to discourage a colleague from raising a concern, or taken as retaliation following a disclosure, will be treated as a disciplinary matter.

Any instruction to cover up wrongdoing or to mislead an investigation is also a disciplinary matter. Any colleague who is instructed to do so, regardless of who gives the instruction, must report this immediately.

Anonymous information

Concerns can be raised anonymously. However, colleagues should be aware that anonymous disclosures are more difficult to investigate and may limit our ability to provide feedback or legal protection. Colleagues are therefore encouraged to provide their name where possible.

When considering anonymous disclosures, we will take into account the following factors, at our discretion:

- the seriousness of the concern raised
- the credibility of the information provided
- the likelihood of obtaining evidence or confirmation from other sources

Policy commitment

This policy underpins our commitment to ethical conduct and responsible governance by:

- Safeguarding colleagues, customers, third parties, assets, and resources from misuse or misappropriation
- Promoting a culture of honesty, integrity, and accountability across all levels of the Group
- Ensuring compliance with legal, regulatory, and contractual obligations
- Supporting a consistent and initiative-taking approach to whistleblowing.

5. EIA statement

An Equality Impact Assessment (EIA) was undertaken for this policy on 20 January 2026.

The EIA ensures that the policy is fair, inclusive, and does not negatively impact any protected groups under the Equality Act 2010. The outcomes of the assessment will be monitored, and actions where needed to promote equity.

We recognise that we may not have identified all adverse impacts on one or more protected characteristics. We welcome any feedback on, or examples of, things that we may have overlooked so that we can continuously improve our policy.

6. Training statement

This policy will be trained out to all colleagues by cyclical internal communications.

7. Measuring Effectiveness

The effectiveness of this policy will be measured through self-assessment and independent scrutiny by periodic internal audit reviews and oversight by Risk and Regulation Group, Executive Disclosure Committee and Audit and Risk Committee.

8. Review Period

This policy will be reviewed every three years by the Group Insurance and Financial Crime Manager, or sooner in response to significant regulatory or organisational changes. Audit and Risk Committee approve this policy.

FOR INTERNAL USE ONLY –

Supporting documents

This policy is supported by:

- Equality Impact Assessment

Version Control

Version	Detail	Approved by	Date
1.0	New Bromford Flagship LiveWest policy	Audit and Risk Committee	February 2026