

Speaking Up Policy

Policy Owner:	Executive Director of Governance
Policy Lead:	Head of Governance
Approved by:	Audit & Risk Committee
Approved date:	February 2025
Next review date:	February 2028

Contents

	Page
Purpose and scope of this policy	2
Policy	
• What concerns can be raised and by who?	2
• Confidentiality and anonymity	3
• How to raise a concern	4
• When you report a concern to us	5
• What to do if you're unsatisfied with our response	6
• Monitoring	6
Definitions	7
Equality, Diversity and Inclusion	6
Data protection	6
Related legislation and regulations	6
Related policies and procedures	6
Customer engagement	8
Document revision history	8

Purpose and scope of the policy

This policy applies to you if you work for us as a 'worker' (employee, contractor, trainee or through an agency). It also applies to you if you're working with us as a consultant, non-executive board member or partner.

The purpose of the policy is to:

- a) set out how you can report concerns about risk, malpractice or wrongdoing that are in the public interest (i.e. that affect others, for example, the general public) for example:
 - Criminal activity (such as theft or fraud)
 - Miscarriages of justice
 - Dangers to health and safety
 - Damage to the environment
 - Breaching legal requirements
 - Concealing any of the above
- b) encourage you to speak up as soon as possible if you have concerns and
- c) reassure you that, if you do, you won't be treated unfairly or lose your job because you 'blow the whistle', and your concerns will be taken seriously and investigated appropriately.

Like other organisations, we face the risk of things going wrong sometimes or of unknowingly allowing illegal or unethical conduct. We recognise that you may be best placed to identify this. So, it's vitally important that we have arrangements in place that allow you to speak up so we can take corrective action and improve how we operate.

We understand you may feel worried about raising a concern. We want you to feel safe and confident to speak up. Raising a concern helps us protect our customers, colleagues and communities, and improve how we work. We commit to maintaining an open, honest, and accountable culture, meaning we'll look into concerns raised and support you.

Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law, unless your particular case is in the public interest. Please report any concerns about these matters in accordance with our Grievance, Bullying and Harassment Policy.

1. What concerns can be raised and by who?

You can raise concerns about any risk, malpractice or wrongdoing that may be harming the services we deliver or otherwise be in the public interest.

Examples of concerns that may be raised under this policy include:

- criminal activity (including theft or fraud)
- miscarriages of justice
- dangers to health and safety
- damage to the environment
- breaches of legal or regulatory requirements
- sexual harassment, including failures to prevent sexual harassment or concerns about a workplace culture that permits or tolerates such behaviour
- the deliberate concealment of any of the above.

The law protects workers who make certain disclosures about wrongdoing in the public interest. Workers include employees, contractors, trainees and agency workers. If you raise a concern that you reasonably believe shows wrongdoing and is in the public interest, you may be protected under whistleblowing legislation.

In accordance with the law and our values, we will take concerns seriously, investigate them appropriately and ensure that individuals who raise concerns in good faith are not subjected to detriment, victimisation or unfair treatment because they have spoken up.

We recognise the value of receiving, investigating and addressing concerns regardless of who they come from. We will therefore apply the principles of this policy to consultants, non-executive board members and partners working with us, even where statutory whistleblowing protections may not apply.

Concerns about an individual's employment situation that affect only that individual should normally be raised under the Grievance, Bullying and Harassment Policy. However, concerns about serious, repeated or systemic misconduct that may affect other people or be in the public interest (including sexual harassment) may be raised under this Speaking Up Policy.

If you are concerned about the safety and wellbeing of a child, or an adult with support needs who is experiencing or may be at risk of abuse or neglect, please report your concerns in accordance with the Safeguarding Children Policy or Safeguarding Adults at Risk Policy.

2. Confidentiality and anonymity

You can report concerns anonymously if you want to (i.e. without giving your name) but doing so might make it harder for us to investigate thoroughly and to provide updates, advice, and support. The person you report your concern to may know your identity, but we won't reveal your identity without your agreement unless required by law (e.g. to the police). We'll assume all matters are raised in confidence unless you tell us otherwise.

Everyone involved (including you) must treat the matter as confidential, both during and after any investigation. Any colleague who breaches confidentiality may be subject to disciplinary action – you can get independent advice from any of the organisations listed in section 3.

We'll investigate all matters raised, whether openly, confidentially, or anonymously. No confidentiality agreement, settlement agreement or non-disclosure agreement (NDA) prevents an individual from making a protected disclosure, reporting a crime, cooperating with a regulator or seeking independent advice regarding whistleblowing rights.

3. How to raise a concern

Please report your concerns to a suitable manager – your line manager if you're employed by us.

Concerns relating to harassment can be raised to: ConfidentialReporting@Moat.co.uk

If you feel that it would be more appropriate, or that you need to escalate your concern, please report your concern to any of the following people:

- Company Secretary
- Chief Executive
- Any Executive Director
- Head of People and Organisational Development
- Audit & Risk Committee Chair
- Moats anonymous reporting line: 01753 55518

We aim to use internal routes for raising concerns. However, if you feel that it would be more appropriate, you can also raise concerns externally through:

- Internal Audit: Lee Cartwright (0330 910 411 or LCartwright@beeverstruthers.co.uk)
- External Audit: Liz Kulczycki (07989 240 702 or liz.kulczyckido.co.uk)
- Regulator of Social Housing (0300 124 5225 or enquiries@rsh.gov.uk)

Concerns can be reported verbally or in writing using the contact details above.

You can get independent advice at any stage, by contacting:

- The independent charity Protect (formerly Public Concern at Work) 0203 117 2520 or protect-advice.org.uk
- A lawyer of your choice at your own expense
- The Citizens Advice Bureau ([Citizens Advice](#))
- ACAS ([Work and employment law advice | Acas](#))
- Your professional body (if you're a member)

We hope you can raise concerns with us. However, we recognise that there may be circumstances where you should properly report matters to outside bodies, such as our regulator or the police. It will very rarely be appropriate to alert the media. If you're unsure as to whether this is appropriate and don't feel able to discuss the matter with us, please seek independent advice from Protect (see above).

4. When you report a concern to us

We're committed to listening to you, learning lessons, and improving our services. If you report a concern to us, the person you report it to (in accordance with section 3) will (if they have your details) contact you within 2 working days to confirm that they've received it.

Where necessary, we'll arrange for a suitable, proportionate, and independent investigation to be undertaken. The Executive Director of Governance and the Head of People and Organisational Development will make the necessary arrangements. If the concern relates to either of those roles that role will not be consulted. Additionally:

- If the concern relates to the Chief Executive, the Chair of the Board will be consulted.
- If the concern relates to the Chair of the Board, the Audit & Risk Committee chair and another Board member will be consulted.

Where appropriate conclusions from any investigation will be shared with you within a timescale that you will be notified of (where you're not anonymous). The investigation will be objective, and a report will be produced which outlines the issues identified and any actions needed to prevent problems recurring. Who the report is shared with will depend on the nature of the concern, but the Audit & Risk Committee will maintain oversight of all whistleblowing reports – see 'Monitoring' below.

We'll treat you with courtesy, empathy, fairness, and respect and keep you informed on progress (while respecting the confidentiality of others). During the investigation, we may need you to provide further assistance. Any meetings with a colleague can include a colleague forum representative or colleague not involved in the area of concern.

You should not investigate matters yourself or attempt to obtain evidence. You should store any evidence you already have securely and provide it to the investigator along with any further background information relating to the concern.

We understand that you may be worried about possible repercussions. If anyone tries to discourage you from coming forward to express a concern, or treats you unfairly because you have, please report this to us so that we can address the behavior in accordance with our Disciplinary Policy and Procedure. We'll take a zero-tolerance approach to all forms of discrimination, harassment, victimisation, and bullying.

If you raise a concern, or have concerns raised about you that are found to be unjustified, we'll support you and protect you from any form of reprisal or victimisation and ensure that your career and employment prospects aren't adversely affected.

Retaliation against a whistleblower is prohibited. Retaliation may include:

- dismissal;
- disciplinary action;
- withholding promotion;

- denial of training opportunities;
- unfavourable changes to duties or working arrangements;
- intimidation, bullying or harassment;
- negative performance assessments linked to a protected disclosure.

Any employee found to have retaliated against a whistleblower may be subject to disciplinary action up to and including dismissal.

If you report a concern to us whilst subject to disciplinary or redundancy procedures, those procedures will continue.

A disclosure will be protected where you reasonably believe that the information tends to show wrongdoing and that the disclosure is made in the public interest.

Disclosures made honestly and with a reasonable belief in their accuracy will not result in disciplinary action simply because they are not substantiated or are found to be mistaken. However, disclosures that are knowingly false, malicious, or made in bad faith may result in disciplinary action.

Making a protected disclosure does not prevent Moat from taking appropriate action in relation to any misconduct, malpractice, or wrongdoing that you may have been involved in.

5. What to do if you're unsatisfied with our response

We'll deal with the concern(s) you've raised fairly and in accordance with this policy. If you're unhappy with how the concern(s) you've raised has been handled, please raise your concerns with a member of the Executive Team or People Services Team, within 20 days of receiving feedback, or as soon as reasonably practicable. You should clearly state why you consider that your original concern(s) has not been dealt with satisfactorily.

6. Monitoring

Our code of governance requires Board to have oversight of this policy. This will be achieved through Audit & Risk Committee being notified of all whistleblowing cases and regularly reviewing the policy. All confirmed whistleblowing concerns will be captured in a whistleblowing register to ensure monitoring and reporting of concerns and key lessons learnt. Audit & Risk Committee will be advised of any learning points arising from the disclosure, recommendations made, and actions to improve existing procedures. Periodic thematic analysis of whistleblowing reports will be undertaken to identify trends, root causes, assurance issues and opportunities for organisational learning.

Definitions

- **Whistleblowing (or speaking up)** – reporting concerns about wrongdoing (including things you've seen at work) in the public interest, for example:
 - criminal activity (including theft or fraud)
 - miscarriages of justice
 - dangers to health & safety
 - damage to the environment
 - breaching legal requirements
 - concealing any of the above.
- **Whistleblower** – a person who raises a genuine concern relating to the above.

Equality, Diversity and Inclusion

This policy will be delivered in accordance with our Equality, Diversity and Inclusion Policy. An Equality Impact Assessment was completed for this policy and considered as part of the approval process.

Data protection

This policy will be delivered in accordance with our Data Protection Policy. A Data Impact Assessment was completed for this policy and considered as part of the approval process.

Related legislation and regulations

- Employment Rights Act 1996 (Part IVA – Protected Disclosures)
- Public Interest Disclosure Act 1998
- Employment Rights Act 2025 (where applicable)

Related policies and procedures

- Anti-Fraud, Tax Evasion and Bribery Policy and the Fraud Response Plan
- Anti-Money Laundering Policy and Procedures
- Code of Conduct
- Complaints Policy
- Data and Technology Acceptable Use Policy
- Data Protection Policy
- Disciplinary Policy and Procedure
- Equality, Diversity and Inclusion Policy
- Grievance, Bullying and Harassment Policy and Procedure
- Health and Safety Management Policy
- Performance Management Policy and Procedure
- Policy on Payments and Benefits to Board members and staff
- Procurement Policy

- Recruitment, Selection and Appointment Policy
- Risk Management Policy
- Safeguarding Adults at Risk Policy
- Safeguarding Children Policy
- Tenancy Fraud Policy
- Training and Development Policy

Customer engagement

We didn't seek customers' views when developing this policy.

Document Revision History (Record of any changes made to the policy)

Date	Changes approved by	Details of changes made
3 March 2025	Head of Risk & Assurance / ED Governance	Hotline number added and Director of People & Organisational Development changed to Head of People & Organisational Development following re-structure.
1 July 2026	Head of People and Organisational Development	As a result of changes to employment legislation and the introduction of the Employment Rights Act 2025, this policy has been updated and strengthened. Key enhancements include: • Expanded guidance and examples of concerns that may be raised under the policy, including concerns relating to sexual harassment. • Enhanced provisions relating to protection from retaliation, reinforcing our commitment to safeguarding individuals who speak up in good faith. • Extension of the recommended reporting timeframe extended to 20 days, in line with current best practice and to provide individuals with a more reasonable opportunity to raise concerns.