

SPEAK OUT POLICY

Speak Out Policy

Responsible Officer	Group Director of Governance
This policy is applicable to	All current and former colleagues, Board and Committee members, contractors, agency staff, involved residents, volunteers and external consultants working on behalf of Karbon Group
Policy version	7
Date this version implemented	September 2026
Date of next review	December 2028

Policy Statement

Karbon's Speak Out Policy explains how colleagues and others working with us can raise serious concerns about wrongdoing safely, fairly and confidently. Speaking out, sometimes called whistleblowing, means sharing information about something that may be unlawful, unsafe, dishonest, harmful to others, damaging to the environment, or being covered up.

This policy is not for personal employment complaints, which are handled through other policies.

The policy supports an open and accountable culture where people are encouraged to speak up when they reasonably believe it is in the public interest to do so.

Karbon will treat Speak Out concerns seriously, consistently and fairly. Concerns raised in good faith will be investigated and people who speak out will be protected from harassment, victimisation or other negative treatment.

Risk the policy is designed to control

6. Governance and Compliance

Key performance measures

The number of recorded Speak Out incidents reported to the Group Audit and Risk Committee by the Company Secretary on an annual basis.

Definitions

For the purposes of this policy, a 'colleague' refers to any employee, board or committee member, contractor, agency worker or involved resident, working on behalf of the Group.

Abbreviations

None

Policy Detail

1.0 Purpose of policy

- 1.1 This Speak Out Policy aims to encourage all colleagues to feel confident in raising concerns where necessary. It provides assurance that any colleague who speaks out will be protected from possible negative consequences (such as disciplinary

action), if the colleague reasonably believes that it is in the public interest to raise those concerns.

1.2 The policy is designed to:

- demonstrate a culture of openness and accountability;
- reassure colleagues that they will not be victimised for expressing their concerns;
- deter fraud, malpractice and misconduct;
- help colleagues play their part and feel valued;
- encourage the continuing delivery of quality services;
- avoid public criticism and the need for crisis management.

2.0 Objectives

2.1 The objectives of this policy are:

- That all colleagues understand what we mean by Speaking Out, and the types of concerns that are covered by the Public Interest Disclosure Act 1998;
- To clearly outline the Group's commitment to openness and good communications, and the protection and support available for those Speaking Out;
- Clear procedures for reporting and investigating concerns.

2.2 This policy is one of a suite of probity policies. The overall objective of the probity policies is to ensure that all individuals and organisations associated in whatever way with the Group act with the highest standards of probity and integrity. This policy should be read in conjunction with the following probity policies:

- Anti-Fraud, Anti-Theft, Anti-Bribery and Corruption Policy
- Gifts and Hospitality Policy
- Conflicts of Interest Policy
- Anti-Money Laundering Policy

2.3 Group colleagues are also required to act at all times in line with the Group's Code of Conduct, which provides guidance to ensure that each colleague's actions and behaviour are consistent with the Group's values and high standards.

3.0 Policy detail

3.1 What do we mean by Speaking Out?

3.1.1 Speaking out is often known as 'whistleblowing' and is protected by the Public Interest Disclosure Act 1998. By speaking out, we mean passing on information concerning wrongdoing, which the colleague reasonably believes is in the public interest.

In accordance with the Act, a person speaking out must:

- 1) **Reasonably believe they are acting in the public interest.** This means that the conduct would affect others and not just themselves. Personal grievances and complaints are not covered by this policy. They are dealt with through the Group's Grievance Policy or Dignity at Work Policy.
- 2) **Reasonably believe that the disclosure shows either past, present or future wrongdoing which must fall into one or more of the following categories:**
 - Criminal offences (including, for example, fraud)
 - Failure to comply with an obligation set up in law
 - Miscarriages of justice
 - Endangering of someone's health and safety
 - Damage to the environment
 - Covering up wrongdoing in the above categories

3.1.2 Examples of wrongdoing in the above categories could include (but are not limited to):

- public funds being used in an unauthorised manner;
- breaches of the Gifts and Hospitality Policy
- failure to declare a conflict of interest or breach of an unauthorised conflict;
- discrimination against a tenant or service user;
- concerns that the safety of a child or vulnerable adult is being endangered;
- money laundering;
- Sexual harassment;
- a breach of building control or planning obligations in a way likely to damage the environment;
- data protection breaches, such as disclosure of personal or sensitive information
- A colleague who is working, or is suspected of working, under the influence of drugs and/or alcohol.

3.2 How to raise your concerns

3.2.1 The Group is committed to treating all disclosures consistently and fairly.

3.2.2 Concerns can be raised using the Speak Out Procedure outlined in a separate document to this policy.

3.2.3 When speaking out, the colleague will not be expected to prove their concerns but should provide sufficient grounds to explain why they are concerned. This could include, for example, details of names, dates and places where actions or omissions have occurred.

3.2.4 The Group will always investigate any disclosure made in good faith but may use a variety of responses depending upon the nature of the concern raised.

3.3 Protection

3.3.1 This policy is designed to offer protection to those Group colleagues who disclose such concerns, provided the disclosure is made:

- to an appropriate person/body in line with the procedure associated with this policy; and
- that the colleague making the disclosure 'reasonably believed' that the disclosure was in the public interest.

3.3.2 The Group will not tolerate any harassment or victimisation and will take appropriate action to protect the individual who is Speaking Out. The Group recognises its vicarious liability for the actions of colleagues who subject any colleague who speaks out under this policy to a detriment.

3.4 Confidentiality

3.4.1 All concerns will be dealt with in a confidential manner and every effort will be made not to reveal the identity of the individual who is Speaking Out, if they so wish. However, at the appropriate time the individual may need to come forward as a witness.

3.4.2 This policy encourages colleagues who Speak Out to put their names to any disclosures they make. Concerns expressed anonymously may still be investigated, but it may be more difficult for the Group to examine them fully, meaning any action taken to look into the disclosure may be limited. Individuals who Speak Out anonymously will not be able to receive feedback.

3.5 False allegations

3.5.1 If a colleague Speaks Out, and the allegation they make is not confirmed by the subsequent investigation, no action will be taken against them. However, if anyone makes an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against the individual concerned.

3.6 External support

- 3.6.1 The independent charity Protect (formerly known as ‘Public Concern at Work’) may be contacted to provide free confidential advice and assistance to anyone who feels they may have a concern to raise. They can be contacted on 020 3117 2520 or at protect-advice.org.uk.
- 3.6.2 Ideally colleagues will feel able to make their disclosure directly to the Group using the Speak Out Procedure. However, there may be some rare circumstances where they feel unable to do so. A disclosure may be made to the Group’s internal auditors, RSM:
- RSM
1 St James’ Gate
Newcastle upon Tyne
NE1 4AD
- 3.6.3 An external disclosure may also be made to a prescribed person without the colleague losing their rights under the Public Interest Disclosure Act 1998. Prescribed persons include:

Regulator of Social Housing

Contact them about matters relating to the regulation of registered providers of social housing in accordance with Part 2 of the Housing and Regeneration Act 2008.

The Health and Safety Executive

Contact them about the health and safety of individuals at work, or the health and safety of the public arising out of or in connection with the activities of persons at work

The Information Commissioner

Contact them about compliance with the requirement of legislation relating to data protection and to freedom of information.

The Director of the Serious Fraud Office

Contact them about matters relating to corrupt individuals or companies offering or receiving bribes to secure a benefit for themselves or others.

Care Quality Commission

Contact them about matters relating to the provision of health and social care.

A complete list of prescribed persons can be found at:

www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2.

3.7 Commitment to training

- 3.7.1 The Group is committed to ensuring that colleagues at all levels of the organisation are appropriately trained in the content and application of this policy.

4.0 Customer Vulnerabilities

- 4.1 This policy is applied in line with our Customers in Vulnerable Circumstances Policy. We want people to be treated fairly, have equality of opportunities, freedom, respect, and access to our services.
- 4.2 We will support people in vulnerable circumstances to help us deliver this service. We will work alongside external agencies such as social services, the police and fire services and other appropriate agencies to help and support people in vulnerable circumstances and to ensure we meet our statutory and regulatory requirements as a social landlord.
- 4.3 Policies and key information are made available on our website.

5.0 Monitoring and Review

- 5.1 The Company Secretary is responsible for the monitoring and review of this policy.
- 5.2 This policy will be reviewed at least every 3 years.
- 5.3 Policy review will be undertaken before the expected review date if there are significant changes to legislative or regulatory requirements, good practice or any other situation arises that makes a review necessary.

6.0 Equality and Diversity

- 6.1 This policy is applied in line with our Inclusion and Belonging Policy. This includes the legal requirements of the Equality Act 2010, Workers Protection Act 2023 and the Public Sector Equality Duty.
- 6.2 At the Karbon Group we aim to eliminate discrimination, promote equality of opportunity, foster good relations and define the nine protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.
- 6.3 If you would like this or any other policies in a different language or format please contact inclusion@karbonhomes.co.uk.

7.0 Data Protection and Privacy

- 7.1 We have a clear policy on data protection and sharing data with other partners/third parties under the requirements of the UK General Data Protection Regulation, the Data Protection Act 2018 and other associated legislation. This is clearly set out in the Data Protection Policy for the Karbon Group which, along with its associated procedures, must be followed throughout the operation of this policy.