



Speak Up Policy

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1. Aim and scope of policy

VIVID is a place where we act professionally and treat people fairly.

This policy is here to make sure you know how to raise a concern if something doesn't feel right and to reassure you that you'll be listened to, supported and protected when you do.

It applies to concerns about serious risks or wrongdoing - including how we treat our customers, how we behave towards each other and how we work with other organisations.

All disclosures will be handled appropriately, consistently, fairly and professionally.

This policy applies to anyone working for or on behalf of VIVID. This includes, but is not limited to:

- all staff and board members
- formally involved residents and volunteers
- suppliers, contractors and partners

Customers and other stakeholders may also use our speak up routes where they wish to raise concerns about serious wrongdoing, unethical behaviour or risks to people, the organisation or the public interest.

2. Policy

When to speak up

Our Speak up policy – sometimes called whistleblowing – gives you a safe and confidential way to raise concerns about anything that doesn't feel right. It's here to protect our people, our customers and our values.

Please speak up if:

- You suspect fraud, bribery, or corruption – even if you're not sure
- You've seen someone being bullied, harassed or discriminated against
- You feel pressured to act against our values or policies
- You're worried about health and safety risks that aren't being addressed
- You believe someone is misusing company resources or data
- You think our supplier, contractors or partners are falling short of our high standards
- You've noticed behaviour that could damage our reputation or public trust

How to speak up

Whatever you're concerned about, please speak to your line manager first (if you work for us). Managers are there to listen and support you and many concerns can be resolved quickly at this level.

If you don't feel able to speak to your manager, or you're not a member of staff, talk to **Duncan Short, our Group Resources Director**. Duncan is our designated Speak up contact and will listen to your concerns in confidence.

If Duncan isn't the right person to review the concern – for example, due to a conflict of interests – another member of the Executive Team can take on the role of reviewing and managing the report.

If you don't feel able to talk to any member of staff, **Caroline Stockmann, our Independent Board Member** can be contacted. She's our confidential reporting board contact for concerns that need independent oversight.

If you need to discuss your concerns with someone completely independent of VIVID, please speak to **Neil Hewitson, our auditor from KPMG** or a representative of a recognised union.

If you work for VIVID, you can also contact the Employee Assistance Programme (EAP) for independent advice.

We will acknowledge receipt of any disclosures by the end of the next working day.

If you receive a Speak Up Report

If you receive a Speak up report – whether as a manager or colleague – you must ensure it is promptly escalated through the appropriate Speak up route. In most cases this will be to our designated Speak up contact, or to another appropriate senior or independent contact where required.

This ensures the concern is assessed through the correct process and handled with the right level of oversight.

If you have any questions or need any advice or support with the Speak up process, please contact a member of the Governance Team.

Other types of concerns

Sometimes concerns are raised that fall under our existing internal processes, such as a disciplinary, complaint or grievance. These will be investigated through the appropriate route but the Speak up Contact will maintain oversight of the investigation to ensure consistency with our Speak up principles

If a customer raises dissatisfaction with our services, this will be logged and managed through our Complaints process, in line with the requirements of the Housing Ombudsman Scheme (or the Energy Ombudsman for heat network related complaints).

In some cases, complaints may need to be referred to external organisations for independent review:

- Residential Leaseholder complaints - First Tier Tribunal (Property Chambers);
- Financial Services concerns - Financial Ombudsman Service;
- Home buyer issues - NHBC or other relevant Home Warranty Body.

Occasionally we may receive information from other stakeholders that appears to be a speak up issue but hasn't been raised through the appropriate channels. In these cases, we will redirect and address the concern through the most appropriate Speak up route.

What happens if you speak up?

First of all, we'll listen to you to understand what your concern is.

We'll handle your report confidentially and aim to maintain confidentiality, to the best of our ability, within the constraints of completing a full investigation and undertaking actions to resolve the situation.

Reports will be stored securely and retained in line with our data retention schedule.

We will not tolerate any form of threat, retaliation or other action against anyone reporting an issue in good faith. Any such threats should be raised through the speak up reporting channels. This is really important because we want people to be able to speak up without worrying about any consequences.

We will provide appropriate support to you once you have made a disclosure.

Once you've spoken up leave it with us and we'll investigate and take whatever action is needed. We may ask you further information as part of the investigation and we'll normally let you know the outcome but sometimes there'll be reasons why we can't.

3. Responsibilities

Speak up contacts will:

- receive speak up reports and handle them appropriately

Executive team will:

- have overall responsibility for this policy and take appropriate decisions on actions and reporting
- take up the role of Speak up contact as and when required

The Audit and Risk Committee will:

- review and approve this policy, at least every three years
- receive quarterly reports on speak up matters
- provide independent oversight of how speak up concerns are handled and escalated

- seek assurance that disclosures are managed fairly, consistently and in line with this policy
- consider whether any speak up matters indicate control weaknesses, emerging risks or the need for further action

The Governance team will:

- facilitate the speak up process, reporting and monitoring of actions
- ensure the policy remains up to date and is published on VIV and our website
- maintain the Speak up log tracking all reports and final resolutions
- facilitate comms to ensure staff and others are aware of the Speak up procedures and to encourage the use of the appropriate channels
- provide quarterly updates to Audit and Risk Committee on Speak up reports

Employees, board members and third parties will:

- read, understand and comply with this policy and associated documents
- avoid any activity that might lead to, or suggest, a breach of this policy co-operate fully with any investigation

4. Reporting and Monitoring

We record all reports on our Speak up Log. We record the number of disclosures received and their nature, maintain records of the date and content of feedback provided to the discloser.

We report all Speak up concerns to the Audit and Risk Committee (ARC) on a quarterly basis. This ensures independent oversight, helps us to identify patterns or risks and confirms that concerns are being handled appropriately and in line with our policy.

We may also report Speak up matters to other key stakeholders – such as the Executive Board, the Group Board, the Independent Commissioners Office (ICO) the Regulator of Social Housing (RSH), our insurers or the police – depending on the nature and seriousness of the concern. This decision will be made as part of the investigation process and only where it is appropriate and necessary to do so.

5. Related Documents

Related policies, procedures and forms include:

- Speak Up Procedure
- Equality and Diversity policy
- Prevention of Financial Crime Policy
- Financial Crime and Fraud Response Plan
- Safeguarding of children and vulnerable adults policies
- Complaints policy
- Code of Conduct

6. Speak Up Contacts Information

Duncan Short - *Group Resources Director* duncan.short@vividhomes.co.uk Mobile: 07753 449295
(*Speak up contact*)

Caroline Stockmann – *Independent Board Member* caroline.stockmann@outlook.com Mobile: 07826 543693

Neil Hewitson - <i>KPMG Internal Auditor</i>	neil.hewitson@kpmg.co.uk	Mobile: 07810 404843
Employee Assistance Programme (EAP)	https://healthassuredeap.co.uk/home	

Co-Creation	N/A
Equality Impact Assessment	This policy underwent an Equality Impact Assessment May 2026
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Policy Owner	Duncan Short, Group Resources Director
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