



Response Date:18/06/2026

2026/605 - Policy

In response to your recent request for information regarding;

Can you please send me a copy of North Wales Police Whistleblowing Policy.

Please find attached.

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST
UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 11/06/2026

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Glan-y-Don, Bae Colwyn LL29 8AW
www.heddlugogleddcymru.police.uk

Police Headquarters,
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**HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE**

WHISTLEBLOWING POLICY

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Policy Writer:	Professional Standards Department		
Policy Number:	046	Version:	1.1
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POLICY

CHANGE HISTORY				
Version No	Author	Changes	Ratification	Date
V1.1	...	Includes reference and acknowledgement of the Economic Crime and Corporate Transparency Act 2023 and reflective of the changes to the Worker Protection Act 2023 and further protections due to come into effect on the 6 th of April in relation to whistleblowing safeguards for employees who report Sexual Harassment.	N/A	19/03/26

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1. WHY IS THIS POLICY REQUIRED?

North Wales Police is committed to conducting its business with honesty and integrity, identifying risks and potential wrongdoing and ensuring that action is taken to address any issues and concerns that are raised both fairly and consistently. We expect all staff to maintain high standards in accordance with the Standards of Professional Behaviour in the Police Regulations and the Code of Ethics. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

All large organisations are expected to have mechanisms for reporting whistleblowing. Policing arrangements are part of the HMICFRS inspection regime.

This Whistleblowing Policy operates in accordance with

- Public Interest Disclosure Act 1998
- The Employment Rights Act 1996
- Employment Rights Act 2025 (Effective April 2026)

And is aligned with obligations under

- Bribery Act 2010
- Criminal Finances Act 2017
- Economic and Corporate Transparency Act 2023

The purpose of this policy is to encourage everyone to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

This policy reflects North Wales Police's commitment to the Code of Practice "Ethical Employment in Supply Chains".

This policy will:

- 1.1 Explain what whistleblowing is and provide guidance on how to raise concerns.
- 1.2 Outline the process that will be followed.
- 1.3 Assist in encouraging a culture of openness and accountability and reassure individuals that they should be able to raise genuine concerns without fear of reprisals.
- 1.4 Protecting individuals who raise concerns from victimisation or detriment.

2. WHO SHOULD USE THIS POLICY?

This policy applies to all North Wales police officers, police support staff, special constables, designated volunteers, contractors, consultants, temporary workers, agency workers and apprentices.

3. WHAT SHOULD I CONSIDER WHEN USING THIS POLICY?

3.1 What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- a) criminal activity (including corruption, fraud, bribery abuse of position);
- b) failure to comply with any legal or professional obligation or regulatory requirements;
- c) miscarriages of justice;
- d) danger to health and safety;
- e) damage to the environment;
- f) financial fraud or mismanagement;
- g) breach of North Wales Police internal policies and procedures;
- h) conduct likely to damage the force reputation or financial wellbeing;
- i) unauthorised disclosure of confidential information;
- j) negligence;
- k) breaching the Standards of Professional Behaviour
- l) Sexual harassment (Explicitly protected from April 2026)
- m) the deliberate concealment of any of the above matters.

A Whistleblower is an individual who raises a genuine concern relating to any of the above and they believe they are acting in the public interest.

If you have any genuine concerns related to suspected wrongdoing or danger affecting any North Wales Police activities (a whistleblowing concern) you should report it under this policy. It is hoped that in many cases you will be able to raise these concerns with your line manager or HR Advisor. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. All cases will be recorded and assessed by the Professional Standards Department but not necessarily investigated by them.

This policy relates to suspected wrongdoing or dangers at work and should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, consider use of the Grievance Resolution Policy or escalation for a misconduct assessment or criminal proceedings.

If a complaint relates to your own personal circumstances but you also have wider concerns regarding one of the areas set out above (for example, a breach of North Wales Police internal policies), you should discuss with your line manager, Senior Management Team, HR Advisor or the Professional Standards Department.

If you are uncertain whether something is within the scope of this policy you should seek advice from your Senior Management Team, HR Advisor or the Professional Standards Department.

4. ROLES AND RESPONSIBILITIES

The Professional Standards Department has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised.

All individuals are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Individuals are

invited to comment on it and suggest ways in which it might be improved.

Comments, suggestions and queries should be addressed to the Professional Standards Department.

4.1 Line Manager / Investigator	• Consider if a disclosure made meets the criteria of a Whistleblower. • Treat all disclosures seriously and consistently. • Provide support to the individual during what can be a difficult or anxious time. • Document the disclosures made and any subsequent meetings on the forms in Appendix 1. • Forward the record of disclosure to PSD. • Provide updates to the individual that meets their needs and expectations. • Confirm requests for confidentiality with the individual and put measures in place where necessary and proportionate to aid anonymity. • If investigating, liaise with departments and individuals as necessary to seek resolution. • Escalate disclosures to SMT and/or PSD where necessary and proportionate. • Ensure that no detriment is suffered by the individual as a consequence of the disclosure made.
4.2 Senior Management Team	• Ensure that no detriment is suffered by the individual as a consequence of the disclosure made. • Determine mode of investigation and responsible department/investigator in circumstances where the disclosure does not require investigation by PSD. • Support Investigator to bring about a resolution to the disclosure.

	• Ensure that support is provided to the individual during what can be a difficult or anxious time. • Respect and support requests for confidentiality.
4.3 HR Advisor	• Consider if disclosure made meets the criteria of a Whistleblower. • Treat all disclosures seriously and consistently. • Ensure that support is provided to the individual during what can be a difficult or anxious time. • Respect and support requests for confidentiality. • Document the disclosures made and any subsequent meetings. • Escalate disclosures where necessary and proportionate. • Ensure that no detriment is suffered by the individual as a consequence of the disclosure made. • Advise on the above to support line managers and Senior Management Teams. • Document the disclosures made and any subsequent meetings on the forms in Appendix 1.
4.4 PSD	• Consider if disclosure made meets the criteria of a Whistleblower. • Treat all disclosures seriously and consistently. • Refer to the Independent Officer for Police Conduct if mandatory criteria met. • Respect and support requests for confidentiality. • Record details of disclosures and individuals concerned. • Act as a subject matter expert / point of referral. • Assess disclosure, determine mode of investigation and responsible department/investigator.

	• Refer to People Intelligence Panel if required. • Analyse data to identify areas of concern or organisational learning.
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If there is uncertainty or a dispute as to whether a disclosure/complaint constitutes whistleblowing and/or who will be responsible for managing the disclosure going forward, a case will be taken to the People Intelligence Panel meeting for a decision to be made. The Panel usually consists of Heads of PSD, Head of Legal, Head of POD and Head of HR but can be extended to include other departmental heads, as required.

5. THE PROCESS

5.1 Raising a Whistleblowing Concern

In many cases initial concerns will be raised with line managers or HR advisor who may be able to agree a way of resolving concerns quickly and effectively.

However, if you prefer not to raise it with your line manager or HR advisor for any reason, you should contact one of the following:

- a) The 2nd line manager or member of the Senior Management Team
- b) The confidential and anonymous Police Integrity Line
- c) The Professional Standards Department
- d) The Anti-Corruption Unit
- e) Staff Associations

Contact details are set out in Appendix 2.

If you have not opted to remain anonymous a meeting will be arranged with you as soon as possible to discuss your concern. You may bring a work colleague or staff association representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

A written record will be made to summarise the content of the meeting (see Appendix 1) and you will be provided with a copy of it.

All disclosures must be forwarded to the Anti-Corruption Unit by email to the anticorruptionunit@northwales.police.uk to be assessed and recorded.

The initial assessment will consider who will be responsible for investigating the concern.

It is hoped that individuals feel confident and comfortable enough to report concerns internally in the first instance, however there are helplines and charities that individuals can contact for support and guidance.

- [The Acas helpline](#) – for more advice on whistleblowing, dismissal and detriment
- [Protect](#) – a UK whistleblowing charity which offers free legal advice

5.2 Confidentiality

North Wales Police hopes that all individuals will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, this will be discussed with you before any further action is taken.

North Wales Police encourages individuals to make whistleblowing disclosures openly and without the need for anonymity. However, the force recognises that this is not always possible and will protect the identities of those who wish to make anonymous disclosures.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the contact points listed in Appendix 2. Please also see Section 5.6 Protection and Support for Whistleblowers.

5.3 Investigation and Outcome

Once you have raised a concern, the Anti-Corruption Unit will carry out an initial assessment to determine the scope of any investigation. You may be required to attend additional meetings in order to provide further information.

As far as possible it will be established of any known connections to any parties involved in the concern to ensure that they are not involved in any process or decision making to ensure impartiality. If there are any concerns in relation to this they are to be raised at the earliest opportunity.

North Wales Police will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

5.4 If You Are Not Satisfied

Following a concern being raised if the individual is not satisfied with the outcome they can raise this through the Employee relations appeals Policy and procedure.

Appeals Policy [Home - \(nwp.net\)](http://nwp.net)

5.5 External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media.

North Wales Police strongly encourages you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are in Appendix 2.

Whistleblowing concerns usually relate to the conduct of North Wales Police individuals or departments, but they may sometimes relate to the actions of a third party. In some circumstances the law will protect you if you raise the matter

with the third party directly. However, we encourage you to report such concerns internally first.

5.6 Protection and Support for Whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. North Wales Police aims to encourage openness and will support individuals who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the individual managing your disclosure, or if not appropriate then the Professional Standards Department immediately. If the matter is not remedied, you are entitled to raise it formally using our Grievance Procedure.

You must not threaten, retaliate, take action to try and identify or reveal the identity of a Whistle blower in any way. If you are involved in such conduct, you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

The Home Office Guidance 2020 entitled: 'Conduct, Efficiency and Effectiveness: Statutory Guidance on Professional Standards, Performance and Integrity in Policy' includes the following at paragraph 3.29:

'An individual who knowingly takes action as a reprisal against a police officer or member of staff who has made a protected disclosure, or their family members or other close associates, should be considered to have breached the Standards of Professional Behaviour. Such a breach would constitute a Recordable Conduct Matter. The protected disclosure must have been made before the reprisal took place and the officer must have known about the protected disclosure and acted deliberately to cause detriment to the police officer or member of staff who made the disclosure. Furthermore, any action taken by an officer to try and improperly prevent a person making a protected disclosure (whether by threats or acts) will also be considered a breach of the Standards of Professional Behaviour and a Recordable Conduct Matter.'

Please note that individuals who have committed breaches of the standards of professional behaviour can still be subject of a misconduct investigation if they make a whistleblowing disclosure.

6 DECLARATION & LEGALITIES

In line with all Force policies, the overarching purpose of this document is to directly support the PCC police and crime plan objectives.

In the writing of this policy cognisance has been taken of the College of Policing Code of Ethics (2024).

North Wales Police policies will be written in accordance with the approved corporate format and published on the Force Intranet, allowing access to staff and public, where appropriate, on the pages of the public facing Internet site under the Force publication scheme and Freedom of Information Act 2000.

The following main legal requirements have been identified within this policy:

- Equality Act 2010
- Human Rights Act 1998
- The Welsh Language (Wales) Measure 2011 and the Welsh Language Standards for the Chief Constable
- Data Protection Act 2018
- Freedom of Information Act 2000
- Health and Safety Act 1974
- Employment Rights Act 1996
- Employment Rights Act 2025 (Effective April 2026)
- Public Interest Disclosure Act 1998
- Police Reform Act 2002, Section 29
- Standards of Professional Behaviour, Code of Ethics
- Enterprise and Regulatory Reform Act 2013

This policy has been written giving due regard to the above legislation and has considered the risk of unfair and/or disproportionate impacts on individuals or

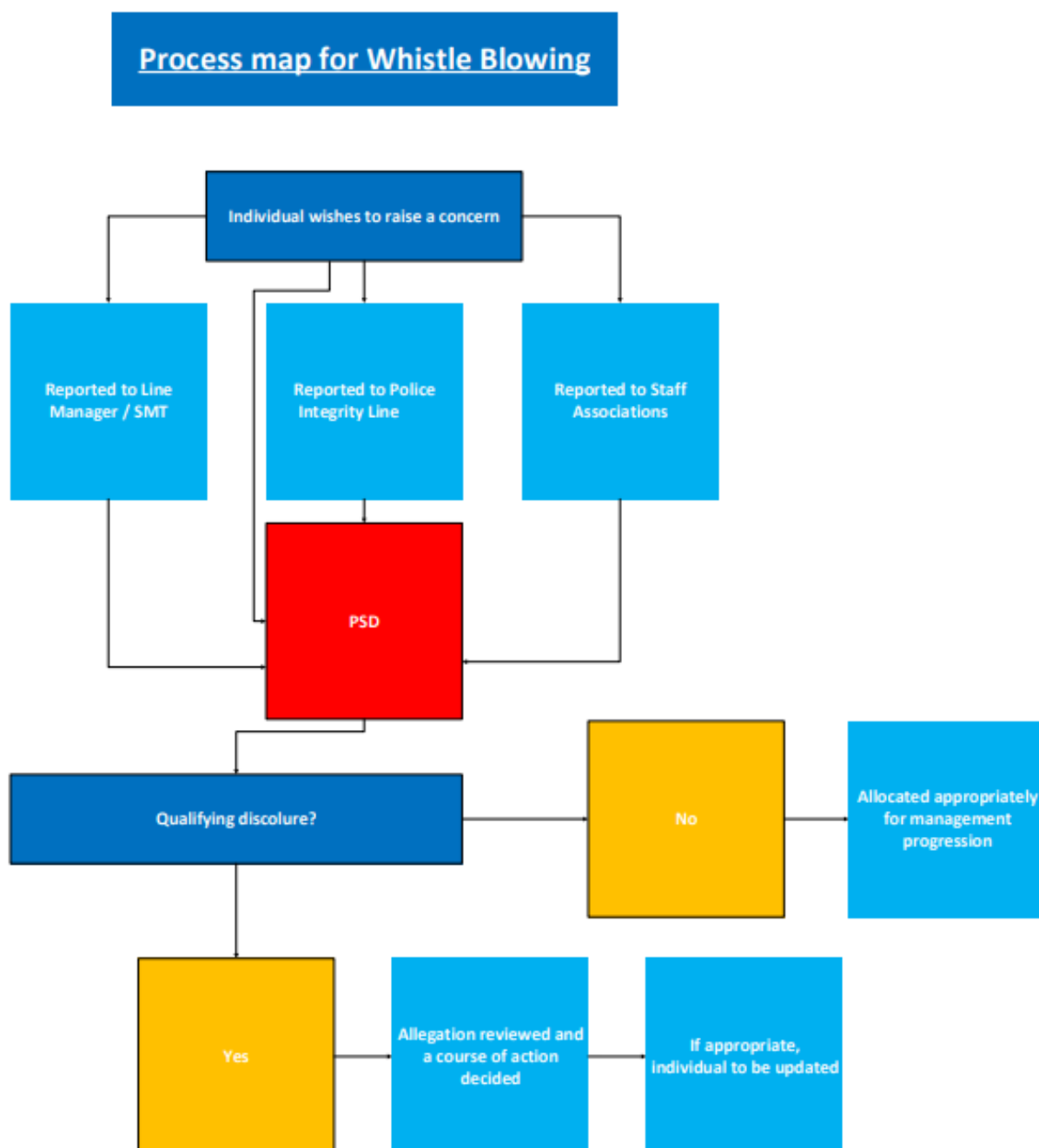
groups (actual or perceived) and has done so via an equality impact assessment (EIA).

New legislative requirements or changes in Force structure may necessitate a review of this policy document.

This policy does not form part of any contract of employment or other terms and conditions, and North Wales Police may amend it at any time, following consultation with representatives of the Staff Association.

7 APPENDICES

7.1 Appendix 1 – Process Map for Whistleblowing



7.2 Appendix 2 – Information and Contact Details

Professional Standards Department	PSDEnquiries@northwales.police.uk PSD - Investigation (nwp.net)
Anti-Corruption Unit	anticorruptionunit@northwales.police.uk PSD - Anti-Corruption Unit (nwp.net)
Crimestoppers Police Integrity Line	0800 111 4444 The Police Integrity Line Crimestoppers
Trade Unions and Federation	FedAdmin@northwales.police.uk UnisonAllReps@northwales.police.uk
PROTECT Independent Whistleblowing Charity	Helpline: 0203 117 2520 info@protect-advice.org.uk Contact our Advice Line - Protect - Speak up stop harm
Independent Office for Police Conduct (IOPC)	enquiries@policeconduct.gov.uk 0300 020 0096