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**HRPOL035**  
**Whistleblowing Policy**

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## WHISTLEBLOWING POLICY

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## 1. Introduction

### 1.1 Whistleblowing

Employees and Workers are protected under legislation called “The Public Interest Disclosure Act 1998” should they wish to raise a concern in relation to some form of malpractice. This process is commonly referred to as “whistleblowing”.

Whistleblowing is the act of reporting concerns about wrongdoing, illegal activities, or unethical behaviour within an organisation. It provides employees and stakeholders with a safe and confidential way to raise issues that may cause concern to individuals, the organisation, or not be in the public interest. A clear whistleblowing process ensures transparency, accountability, and protection for those who speak up, fostering a culture of integrity and trust.

### 1.2 What Can You ‘Whistleblow’ About?

You are protected by law if you report any of these qualifying disclosures:

- Criminal offences
- Example: fraud, bribery, corruption.
- Failure to comply with a legal obligation
- Miscarriage of justice
- Health and safety risks
- Environmental damage
- Concerns raised about sexual harassment
- Covering up any of the above

This policy sets out the procedure for raising a whistleblowing concern and the support and protection that is available to you when you do so.

YPO will ensure that anyone making a protected disclosure is supported and safeguarded from any detriment.

Concerns in the context of malpractice at YPO, may also include the following:

Maladministration, non-compliance with YPO policy, discrimination, failure to act on a situation which could potentially damage YPO financially, other unethical conduct, negligence or unprofessional behaviour.

The concerns may be in respect of the actions or inactions of employees. The overriding concern should be that it would be in the public interest for the malpractice to be corrected and, if appropriate, sanctions applied.

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## 2. Scope

YPO’s Board of Directors, together with all levels of management throughout YPO, will ensure that every employee receives the necessary and appropriate support when reporting unacceptable practice.

It is in the interest of all concerned that disclosures of wrongdoing or irregularity are dealt with appropriately, quickly and discreetly. This includes the interests of YPO, its employees, and any individuals that are the subject of such disclosures, as well as the whistleblower themselves.

This policy applies to all individuals working for, or on behalf of YPO, including permanent and temporary employees, agency workers, contractors, and consultants. It is designed to ensure that concerns can be raised without fear of reprisal.

If your concern relates to a personal grievance that is not in the public interest (for example, an allegation of bullying or harassment, or an allegation that your contract of employment has been breached), you should raise it under our separate grievance procedure.

If you are unsure about whether your concerns are best dealt with under the Whistleblowing policy or grievance procedure, please speak to the nominated person confirmed at the end of this document.

### Sexual Harassment

From 6 April 2026, the Employment Rights Act 2025 explicitly includes sexual harassment as a category of wrongdoing capable of being the subject of a protected disclosure.

This policy should be used where the concern about sexual harassment is raised in the **public interest** (e.g., risk to others, systemic issue). Such reports will be treated as **whistleblowing** and attract statutory protection.

Individual, personal complaints that do not meet the public-interest test may be routed through our Bullying and Harassment Protection/Grievance procedures. We will signpost the most appropriate route and will not reject a report solely due to labelling. (We will apply whistleblowing protections if the legal criteria are met).

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This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

### 3. Data Protection

YPO is committed to protecting personal data in accordance with the UK GDPR and the Data Protection Act 2018. Any personal data processed under this policy will be handled lawfully, fairly, and transparently, and only for the purposes of investigating whistleblowing concerns. Access to such data will be restricted to those with a legitimate need, and data will be retained only for as long as necessary.

### 4. Purpose of the Policy

This policy aims to:

- provide avenues for employees to raise concerns and receive feedback on any action taken
- allow employees to take the matter further if they are dissatisfied with YPO's response to the concerns expressed
- reassure employees that they will be protected from possible reprisals or victimisation

YPO is committed to the highest possible standards of conduct, as set out in the Employee's Code of Conduct and various policies. Therefore, employees who have concerns about suspected wrongdoing within YPO are encouraged to come forward and report those concerns.

### 5. Guiding Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing and malpractice at work.
- Employees should be observant and watch for illegal or unethical conduct and report anything of that nature that they become aware of.
- Managers must treat all whistleblowing disclosures in confidence and provide appropriate support to an employee raising a concern.
- Managers must deal with a whistleblowing matter quickly.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the employee who raised the issue, subject to data protection and confidentiality regulations.

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- No employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because they have raised a legitimate concern.
- Victimisation of an employee for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure the YPO's Disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation may be a disciplinary matter.

We recognise that raising a whistleblowing concern can be daunting. However, we encourage you to report concerns internally as soon as possible where you suspect wrongdoing. We will take all concerns that you raise seriously.

It is not necessary for the employee or stakeholder to have proof that such an act has been, is being, or is likely to be, committed - a reasonable belief is sufficient.

An employee has no responsibility for investigating the matter, it is YPO's responsibility to ensure that an investigation takes place.

An employee or worker who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

It is not necessary for you to prove the wrongdoing. However, to be protected by whistleblowing laws against detrimental treatment or dismissal, you must reasonably believe that wrongdoing (related to one of the categories listed above) is being, has been, or is likely to be committed and that your disclosure is in the public interest.

YPO is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, YPO expects employees and others with serious concerns about any aspect of its work to come forward and voice those concerns.

This policy is intended to encourage and enable employees to raise serious concerns **within** YPO rather than overlooking a problem or blowing the whistle outside.

An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you

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should not agree to remain silent. You must report your concerns to a nominated person as detailed at the end of this policy

## 6. Safeguards

### Harassment or Victimisation

YPO recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those who may be guilty of malpractice or from YPO as a whole. YPO will not tolerate any form of harassment or victimisation (including informal pressures) and will take appropriate action in order to protect a person who raises a concern in good faith.

### Confidentiality and Anonymity

Whilst absolute confidentiality cannot be guaranteed in all cases, YPO will protect the identity of whistleblowers when requested and as far as possible. This includes ensuring that the identity of the whistleblower and relevant parties is disclosed only on a need-to-know basis, and that any necessary disclosures are communicated to the whistleblower beforehand.

In the alternative, you may decide to raise a whistleblowing concern anonymously.

You can do this via the Wakefield Council’s internal whistleblowing hotline which is confirmed at the end of this policy. YPO employees have access to use this number.

We encourage anonymous reporting over remaining silent. Whilst we will investigate any concern that is reported anonymously as far as is reasonably practicable, an anonymous report is likely to be more difficult for us to investigate and we will not be in a position to provide you with any feedback.

Anonymity must not be used to facilitate false or malicious allegations.

## 7. Procedure

### 7.1 Raising a Whistleblowing Concern

#### Stage 1

If you have a genuine concern relating to any type of wrongdoing or malpractice that is covered under this policy, you should raise it in the first instance with your line manager. If your concern relates to your line manager, or if for any reason you do

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not wish to approach your line manager, you should raise your concern with a more senior manager or a then nominated person below.

You can raise your concern orally, or in writing. It is important that you set out clearly:

- the details of the suspected wrongdoing or malpractice;
- the names of any individuals involved; and
- and what action (if any) you are seeking.
- If you have any documentary evidence, you should also provide this

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible. You may, if you wish, bring a colleague or a trade union representative with you to the meeting.

## 7.2 Responding to Your Whistleblowing Concern

### Stage 2

a) The action taken by YPO will depend on the nature of the concern.

In most instances, it is expected that in order to protect individuals and YPO, initial enquiries will be made to decide whether a whistleblowing investigation is required and, if so, what form this investigation will take. Some concerns about suspected wrongdoing may, however, be resolved by agreed or alternative action without the need for a whistleblowing investigation.

If urgent action is required, this will be taken before any investigation is conducted.

b) The appropriate nominated officer will advise and determine if a whistleblowing investigation will take place and, if so, the terms of reference for that investigation and then take the decision to:

- Complete the investigation internally using an independent and impartial officer; or,
- Refer the matter to an external body for them to investigate; or,
- Refer the matter to the YPO's external Auditor (Wakefield Council); or,
- Refer the matter to the Police; or,

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- Organise an independent inquiry; or,
  - Refer the matter for consideration under any other existing YPO procedure as may be appropriate in the circumstances; or,
  - Take no further action.
- c) Within seven working days of a concern being raised, YPO will write to you acknowledging that the concern has been received, indicating how it proposes to deal with the matter and give an estimate as to how long it will take to provide a final response.
- d) If it is impossible for initial enquiries to be completed within the suggested timescale, the situation will be explained in the letter of acknowledgement. Where a decision is made that no investigation will take place, the reasons for this will be provided. In so far as possible, a final resolution of the matter will normally be aimed for within 28 days of the complaint being lodged. If this is likely to be longer you will be informed.
- e) The amount of contact between yourself and the nominated officer considering the issues will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, further information may be sought from the person raising the concern.
- f) Where any meeting is arranged, you will have the right, if you so wish, to be accompanied by a union representative or a work colleague who is not involved in the area of work to which the concern relates. Upon request, any meeting may be held away from the workplace and/or outside working hours if appropriate.
- g) YPO will take appropriate steps to minimise any difficulties which you may experience as a result of raising a concern. For example, if you were requested to give evidence in criminal or disciplinary proceedings, YPO would need to consider what steps were required to protect you from detriment. Whilst you would have the right not to attend such proceedings, you should be made aware that a successful conclusion to the resolution of your concern may not be possible without your attendance.
- h) YPO accepts that employees raising a concern need to be assured that the matter has been properly addressed. Subject to legal constraints, you will receive as much information as possible about the outcomes of any investigation.

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- i) The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing.

Following the investigation, you will be informed in writing, as quickly as possible after completion of the investigation, of the outcome and any next steps or action that will be taken.

- j) While we aim to provide you with comprehensive feedback, in some cases this may not be possible, for example where data protection rules apply or there are sensitive issues that need to remain confidential.

### 7.3 Appeal

#### Stage 3

If you are not satisfied with how your concern has been dealt with, you should appeal to the Head of Finance, as detailed at the end of this policy.

You can raise your appeal orally, or in writing. It is important that you set out clearly the grounds of your appeal, such as the basis on which you consider that your original concern has not been satisfactorily dealt with.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your appeal. This will be arranged as soon as possible. You may, if you wish, bring a colleague or a trade union representative with you to the meeting.

A nominated officer will consider your grounds for appeal and review the manner in which your original whistleblowing concern was handled. You will be informed in writing of the outcome as quickly as possible.

### 7.4 Raising Your Whistleblowing Concerns Externally

We encourage you to raise your whistleblowing concerns internally in the first instance. If you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person (see list on [GOV.UK](https://www.gov.uk)).

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing legislation unless certain conditions are met.

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## 8. False and Malicious Allegations

YPO will protect itself and its employees from false and malicious complaints by taking disciplinary action where appropriate. In addition, a complaint, which is genuinely believed, may prove to be unfounded on investigation.

YPO will try to ensure that the negative impact of either a malicious or unfounded allegation about any person is minimised. However, it acknowledges that it will not be possible to prevent all of the repercussions potentially involved.

## 9. Who to Contact

Advice and guidance on how matters of concern may be pursued can be obtained by contacting

- YPO’s nominated Whistleblowing Officer
  -
- YPO’s Head of Finance
  - Matthew Hirst: [Matthew.Hirst@ypo.co.uk](mailto:Matthew.Hirst@ypo.co.uk)

Alternatively, you may wish to get confidential advice from:

- a trade union or professional association
- relevant statutory bodies, regulatory organisation or an advisory body such as ‘Protect’
- a whistleblowing officer at Wakefield Council on 0808 1567 525 or email: [whistleblowing@wakefield.gov.uk](mailto:whistleblowing@wakefield.gov.uk)

**Protect** is a charity which provides free support to both organisations and individuals with regard to whistleblowing issues. It also provides a safe haven where employees can confidentially discuss whether and how best to raise a whistleblowing concern [Protect - Speak up stop harm - Whistleblowing Homepage](#).

## 10. Responsibility for Implementing the Policy

The responsibility for ensuring that YPO adheres to this policy rests with the YPO Board of Directors.

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