



Trust



Kindness



Hope

“Together, we will end poverty”

CLWYDALYN POLICY

Whistleblowing Policy

HR-POL-01
Version 5

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ClwydAlyn

ClwydAlyn Housing Limited
72 Ffordd William Morgan,
Parc Busnes Llanelwy, Llanelwy,
Sir Ddinbych, LL17 0JD

ClwydAlyn Housing Limited
72 Ffordd William Morgan,
St Asaph Business Park, St Asaph,
Denbighshire, LL17 0JD





About ClwydAlyn

Our mission is to beat poverty, and we strive to support our residents into work, training and volunteering.

How we do things



Trust



Kindness



Hope

Contact us



Customer Services

Monday to Friday 08:00 to 17:00 Freephone from a landline 0800 183 5757 or 01745 536800

Out of hours emergency repairs 0300 1233091 or text 07786 202533 (please remember to include your name, address and telephone number in your message).



E-mail/online

help@clwydalyn.co.uk or online @ <https://www.myclwydalyn.co.uk/>



Postal address

72 Ffordd William Morgan
St Asaph Business Park
St Asaph
Denbighshire LL17 0JD

#InfluenceUs

Do you want the chance to feedback on what is important to you as a ClwydAlyn resident? Do you want to help shape and improve the service we provide to you? Do you have anything from a few minutes to a few hours to spare each month? If the answer is Yes, then this is your chance to become an Influencer at ClwydAlyn, please follow the link [#influenceus form](#) or contact influenceus@clwydalyn.co.uk

Equality, Diversity and Inclusion

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V1	Original Document. Approved by Boards and Management	T. Henderson	07/11/2016
V2	Document updated. Approved by Boards and Management	T. Henderson	26/07/2018
V3	Document updated and reformatted. Approved by Boards and Management	R. Williams	20/01/2020
V4	Updated. Approved by People Committee 17/04/2023	E. Gilbert	06/06/2023
V5	Updated to comply with Prevention of Fraud, AML Reference. Approved at Assurance Committee 26/01/2026	S. Williams	26/01/2026



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1 Introduction

1.1 Here at ClwydAlyn, we are committed to conducting our business honestly and with integrity at all times. Unfortunately, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring bad, unethical or even illegal practice.

We are committed to having a culture of openness and accountability so that we can prevent these situations occurring or to address them if they do happen.

1.2 The aims of this policy are:

- Ⓐ To encourage and support the reporting of any perceived wrongdoing as soon as possible, in the knowledge that concerns will be taken seriously and investigated appropriately
- Ⓐ To provide guidance on how to raise concerns
- Ⓐ To provide reassurance that everyone should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken

2 What is Whistleblowing?

2.1 'Whistleblowing' is the disclosure of information relating to suspected wrongdoing, danger, fraud, failure to comply with health and safety requirements or other illegal or unethical conduct within the business.

2.2 Any concerns disclosed under this policy should be in the public interest. This means that you should believe that your concern affects the rights, health, or finances of the public at large. If you are an employee and the matter is more of an individual or personal nature, you should raise your concerns using the company's Guidance on Supporting to Resolve Conflict. If the matter relates to a vulnerable person, you should also refer to our Safeguarding Policy for Adults and Children. If you are a Resident, you may also want to refer to the Compliments and Complaints Guidance on our Website.

2.3 We recognise that disclosures made under this policy may involve highly confidential and sensitive matters and that you may prefer to make an anonymous disclosure. However, we regret that we cannot guarantee to fully investigate all anonymous allegations. Proper investigation may prove impossible if the investigator can't obtain further information from you, give you feedback, or ascertain whether your disclosure was made in the public



interest. We encourage anyone wanting to raise a concern to reveal their identity and measures can be taken to preserve confidentiality if appropriate (see Section 5).

- 2.4 You should raise your concern at any time about an incident that happened in the past, is happening now or that you will believe will as a result of any of the points covered in 2.1.
- 2.5 As a Whistleblower, there are protections in place. No-one raising a concern under this policy will be treated unfairly or be at any detriment for doing so – see Section 6.

3 Who does this policy apply to?

- 3.1 This policy applies to everyone who carries out work for ClwydAlyn including:
 - ⓐ All employees, including zero-hour/bank staff and casual workers
 - ⓐ Contractors and sub-contractors
 - ⓐ Agency staff
 - ⓐ Consultants
 - ⓐ Work experience students and volunteers
 - ⓐ Board and Committee Members
 - ⓐ Residents and those applying for roles with ClwydAlyn may raise concerns under this policy
- 3.2 This policy does not form part of any employee's contract of employment, and it may be amended at any time.

4 What does this policy cover?

- 4.1 You should make a disclosure under this policy if you have genuine concerns relating to any of the following:
 - ⓐ someone's health and safety is in danger
 - ⓐ negligence
 - ⓐ criminal activity
 - ⓐ miscarriages of justice
 - ⓐ failure to comply with legal, statutory or regulatory obligations (for example Welsh Government Regulations relating to Social Housing or Care Inspectorate Wales Regulations relating to the provision of care)



- ⌚ practices endangering health and safety or failure to comply with legal, statutory or regulatory obligations (for example, the Health & Safety at Work Act 1974)
- ⌚ any illegal behaviour which will damage the environment such as dumping waste or discharging pollutants into land or water
- ⌚ bribery
- ⌚ financial fraud, impropriety, or mismanagement
- ⌚ breach of our internal policies and procedures (including our Code of Conduct):
 - ⌚ conduct likely to damage our reputation
 - ⌚ unauthorised disclosure of confidential information
 - ⌚ professional malpractice
 - ⌚ significant relationship failures, including those between Board, Staff and the Senior Leadership or Executive Team
 - ⌚ any attempt to conceal any of the above

- 4.2 We value any reasonable and genuine concerns reported under this policy. If you are uncertain whether your concerns fall within the scope of this policy (for example, if you are suspicious but uncertain as to whether the law has been broken), we encourage you to seek advice from an Executive Director.
- 4.3 There is an independent body named Public Concern at Work (PCAW) from who you can take confidential advice as to how to proceed. Contact details for PCAW (Public Concern at Work Independent Whistleblowing Charity) are provided in the Whistleblowing Procedure (link under section 7).
- 4.4 In accordance with the Economic Crime and Corporate Transparency Act (ECCTA) 2023, ClwydAlyn has a duty to maintain effective procedures and controls to prevent, detect and respond to fraud and money laundering, therefore, colleagues are encouraged and expected to act as the first line of defence by reporting any concerns as soon as possible through the confidential whistleblowing channels provided in this Policy. Should an offence be suspected, ClwydAlyn could be held criminally liable if an employee, agent or associated person commits fraud for the organisation's benefit and adequate fraud prevention procedures were not in place.
- 4.5 As a registered social landlord, we have a duty to protect public funds, uphold the highest standards of integrity and act transparently in all our operations. All colleagues have a responsibility to raise concerns where they suspect or become aware of fraud, money laundering, bribery or any other forms of economic crime. This includes matters which may give cause for concern under the failure to prevent fraud offence as part of the Economic Crime and Corporate Transparency Act. All disclosures made in good faith



will be treated seriously, investigated appropriately and individuals will be protected from any form of retaliation for speaking up in line with this Policy. This Whistleblowing Policy forms a key part of our fraud prevention framework by providing a safe and confidential route for employees, contractors and stakeholders to raise concerns about suspected fraudulent or unethical behaviour.

5 Confidentiality

- 5.1 Every effort will be made to keep the identity of an individual who makes a disclosure under this policy confidential, at least until any formal investigation is under way. There may, however, be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. If we believe this is the case, we will discuss with you the reasons why disclosure is necessary.
- 5.2 To protect the integrity of the investigation, we ask that any individual raising a concern keeps their concerns and the identity of those involved confidential.

6 Protection and Support

- 6.1 No one who raises genuine concerns in the public interest under this policy will be dismissed or subjected to any detriment as a result. If you believe that you are being subjected to any detriment as a result of raising your concerns, you should inform the investigator immediately.
- 6.2 The Employment Rights Act 1996 and the Public Interest Disclosure Act 1998. governs the making of disclosures concerning workplace activities and is intended to protect those who blow the whistle on bad practice from being subjected to any detriment or being unfairly dismissed as a result. Public Interest Disclosure does not cover Board Members, Residents or people applying for roles with ClwydAlyn however, concerns raised by Board Members, Residents or job applicants will be treated in the same way as qualifying disclosures from staff. If you are a staff member affected by concerns related to whistleblowing, you have access to ClwydAlyn's free and confidential employee assistance programme, details of which you can find here. If you feel you need any additional support, please speak with your line manager, the investigator or your People Specialist.

If you are not employed by ClwydAlyn but are affected by concerns related to whistleblowing, please discuss with the investigator any support you need.



7 Procedure and Reporting

You can access the Whistleblowing Procedure (HR-P-37) [here](#).

Whistleblowing cases are reported to the Assurance Committee.

8 References

Anti Money Laundering Policy (GOV-POL-05)	(click here)
ClwydAlyn Modern Slavery Statement (Website footer)	(click here)
Complaints Policy (GOV-POL-19)	(click here)
Guidance on Supporting to Resolve Conflict (HR-G-60)	(click here)
Safeguarding Policy Adults and Children (HR-G-39)	(click here)