



Whistleblowing Policy

**Clear governance.
Strong practice.
Safe services.**



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1. Introduction

D2 PropCo is committed to operating with integrity, transparency, and accountability in every part of its business. As a company working closely with vulnerable adults, homeless households, 16–17 year olds, and unaccompanied asylum seeking children (UASC), we recognise that people across our organisation may occasionally see or experience things that do not align with our values or legal obligations. When this happens, it is essential that concerns can be raised safely, confidently, and without fear of negative consequences.

“Whistleblowing refers to raising a concern about suspected wrongdoing that is in the public interest”

In line with the Public Interest Disclosure Act 1998 (PIDA), whistleblowing includes reporting information that a worker reasonably believes shows criminal activity, legal or regulatory breaches, health and safety risks, environmental harm, safeguarding concerns, or attempts to conceal such wrongdoing. These protections apply regardless of seniority and ensure that individuals who speak up in good faith are legally protected from detriment.

Effective whistleblowing arrangements are a core part of responsible governance. They help safeguard residents, protect staff, prevent harm, and ensure that D2 PropCo continues to operate ethically and lawfully. We want everyone connected to D2 PropCo (employees, contractors, suppliers, and residents) to feel able to raise concerns early, knowing they will be listened to, taken seriously, and protected.

This policy explains how to raise a concern, how it will be handled, and the safeguards in place to ensure that speaking up is always safe and supported.

2. Purpose

D2 PropCo believes that speaking up is a vital part of keeping residents safe, protecting vulnerable people, and ensuring our organisation operates with integrity. This policy ensures that anyone connected to D2 PropCo can raise concerns about wrongdoing in a safe, supported, and transparent way.

- To ensure all employees, contractors, residents, and partners can raise concerns about wrongdoing without fear of reprisal.
- To protect the integrity, safety, and ethical operation of D2 PropCo.
- To ensure concerns are addressed promptly, fairly, and transparently.
- To support early identification of risks affecting vulnerable residents, including safeguarding, exploitation, and compliance failures.



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3. Scope

This policy applies to:

- All D2 PropCo employees (permanent, temporary, agency).
- Board members and senior leaders.
- Contractors, suppliers, and consultants.
- Residents and community partners who may observe wrongdoing linked to D2 PropCo's activities.

Residents may raise concerns through simplified, accessible routes, recognising the additional vulnerabilities of those we support.

4. What Counts as Whistleblowing

Whistleblowing covers concerns about serious wrongdoing, including:

- Criminal activity or suspected criminal activity.
- Fraud, financial irregularity, or misuse of company assets.
- Breaches of legal or regulatory obligations (e.g., fire safety, gas safety, electrical compliance).
- Health and safety risks, including unsafe working or living environments.
- Environmental damage or risk.
- Serious safeguarding concerns relating to residents or staff, including:
 - o abuse or neglect
 - o exploitation (including county lines, trafficking, modern slavery)
 - o concerns about staff behaviour
- Cover ups or deliberate concealment of any wrongdoing.
- Serious breaches of D2 PropCo policies, including bullying, harassment, or discrimination where the behaviour is systemic, repeated, or organisationally enabled.

This is distinct from:

- Personal grievances (handled via the Grievance Policy).
- Routine complaints or dissatisfaction (handled via the Complaints Policy).
- Routine safeguarding referrals (handled via the Safeguarding Policy).



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5. Principles

D2 PropCo is committed to creating a culture where speaking up is encouraged, valued, and acted upon. The principles detailed below set out the standards that guide how whistleblowing concerns are received, assessed, investigated, and learned from across the organisation.

- Zero tolerance of victimisation of anyone raising a concern in good faith.
- Confidentiality wherever possible, with clear explanation of limits.
- Fair, proportionate, and timely investigation of all concerns.
- Independence in decision making, with escalation routes outside line management.
- Use of external investigators where senior leaders or Board members are implicated.
- Learning and improvement, not a “blame” culture.
- Transparency in reporting themes and outcomes to the Board.
- Trauma informed practice when concerns are raised by vulnerable residents.

6. How to Raise a Concern

Raising a concern should always feel safe, straightforward, and supported. This section sets out the clear routes available to staff, contractors, and residents, ensuring that concerns can be raised early, confidentially, and without fear of negative consequences.

Internal routes

Concerns can be raised via:

- Line Manager (unless implicated).
- Senior Leadership Team.
- Designated Whistleblowing Officer (to be named).
- Board Chair (for concerns involving senior leaders).
- Safeguarding Lead (for concerns involving children, UASC, or vulnerable adults).

Resident friendly routes

Residents may raise concerns via:

- their Support Worker or Housing Officer
- a dedicated reporting email or phone line
- a trusted external advocate or support agency
- anonymous written concerns submitted at the property

Staff must ensure residents are supported to raise concerns safely and without fear.



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External prescribed bodies

Where appropriate, concerns may be raised directly with:

- Health and Safety Executive (HSE) – safety risks
- Local Authority Children’s Services – safeguarding concerns about UASC or 16–17 year olds
- Adult Safeguarding Teams – concerns about vulnerable adults
- Local Authority Designated Officer (LADO) – concerns about staff behaviour towards children
- Police – criminal activity
- Environment Agency – environmental harm
- Information Commissioner’s Office (ICO) – data breaches
- HMRC – tax or financial wrongdoing

7. What Happens After a Concern Is Raised

Once a concern is raised, it is essential that the next steps are clear, consistent, and handled with care. People who speak up, need to have confidence that their concerns will be taken seriously, assessed promptly, and managed in a way that protects their safety and the safety of others. This section explains how concerns are acknowledged, assessed, investigated, and concluded.

- Acknowledgement within 5 working days.
- Initial assessment to determine the appropriate route (informal resolution, formal investigation, safeguarding referral, external escalation).
- Investigation by an impartial manager or external investigator.
 - External investigation will be used where independence cannot be assured.
- Updates provided at least every 10 working days during an investigation.
- Conclusion normally within 30 working days unless complexity requires more time.
- Outcome shared with the whistleblower where appropriate, respecting confidentiality.
- Actions and learning reported to the Board, with immediate escalation for:
 - serious safeguarding concerns
 - criminal activity
 - fire, gas, or electrical safety risks
 - fraud or financial irregularity
 - systemic risk to residents or staff



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8. Protection and Support

Whistleblowers acting in good faith are protected from dismissal, disciplinary action, detriment, or harassment. Any retaliation will be treated as a disciplinary offence. Support may include:

- Access to HR
- Wellbeing services
- External advice (e.g., Protect, trade unions)
- Adjustments to working arrangements where needed

Residents raising concerns will be supported in line with trauma informed practice.

9. Malicious or Vexatious Allegations

D2 PropCo encourages people to speak up whenever they believe something is wrong. We recognise that concerns raised in good faith, even if later found to be mistaken, are always protected. No one will face negative consequences for raising a genuine concern.

However, deliberately making false allegations or misusing the whistleblowing process is a serious matter. Malicious or vexatious reports can cause harm to individuals, undermine trust, and divert attention from genuine safeguarding and compliance issues. Where an allegation appears intentionally false:

- The circumstances will be reviewed carefully
- Support will be offered to anyone affected
- Staff may be managed under the Disciplinary Policy
- Resident cases will be handled proportionately, taking account of vulnerabilities and safeguarding needs

10. Record Keeping and Reporting

Accurate and secure record-keeping is essential to ensure transparency, accountability, and effective oversight of whistleblowing concerns. It enables D2 PropCo to identify patterns, manage risks, and demonstrate that concerns are handled properly and in line with legal and regulatory requirements.

- All whistleblowing concerns will be logged securely.
- Records will be retained for six years, unless legal requirements specify otherwise.
- Access will be restricted to the Designated Whistleblowing Officer and relevant senior leaders.
- Themes, risks, and learning will be reported to the Board at least annually.
- Personal data will be handled in line with GDPR and data protection legislation.



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11. Review

This policy will be reviewed annually or sooner if legislation, regulation, or organisational learning requires it.

12. Policy Approval & Version Control

Policy Owner:	Business Support Manager (Designated Whistleblowing Lead)
Approval:	Board
Date:	09/04/2026
Tier:	1 – Core Governance Policy
Review Cycle:	Annual

Lets Talk

CARDIFF: 02920 024429 / **CAERPHILLY:** 07816 897244

EMAIL: info@d2propco.com

CARDIFF (SOUTH)

Millgrove House,
Parc Ty Glas,
Llanishen, Cardiff
CF14 5DU

FLINTSHIRE (NORTH)

11 Chester Road
West Shotton
Deeside
CH5 1B

WAREHOUSE

Unit 22, Dyffryn Court
Dyffryn Ind.Est.
Caerphilly
CF82 7TT