

Whistleblowing Policy

Wrexham BID Ltd | Company No. 16536873

Last Updated: February 2026

1. Purpose and Scope

Wrexham BID Ltd is committed to the highest standards of openness, integrity, and accountability. This policy encourages and enables employees, Board members, and contractors to raise genuine concerns about wrongdoing, without fear of victimisation or detriment. It is prepared in accordance with the Public Interest Disclosure Act 1998 (PIDA) and the Employment Rights Act 1996.

This policy applies to all employees, workers, Board members, and contractors engaged by or working with Wrexham BID Ltd.

2. What is Whistleblowing?

Whistleblowing means making a protected disclosure — that is, reporting information which a worker reasonably believes is in the public interest and shows that one or more of the following has occurred, is occurring, or is likely to occur:

- A criminal offence (e.g., fraud, theft, or misuse of BID funds).
- A failure to comply with a legal obligation.
- A miscarriage of justice.
- A risk to the health or safety of any individual.
- Damage to the environment.
- The deliberate concealment of any of the above.

Whistleblowing is distinct from a personal grievance about an individual's own employment or working arrangements. Personal grievances should be raised under the BID's grievance procedures. Whistleblowing concerns matters of wider public interest.

3. Who Can Use This Policy?

This policy is available to:

- All BID employees and workers.
- Board members and co-opted advisers.
- Contractors, consultants, and agency workers engaged by the BID.
- Former employees, in relation to concerns arising from their period of employment.

4. How to Raise a Concern

Concerns should normally be raised in the first instance with the **BID Manager**. If the concern involves the BID Manager, or if the person raising the concern is uncomfortable doing so, it should be raised directly with the **Chair of the Board**.

If neither of these routes is appropriate, or if the concern relates to the Chair, it should be raised with another Board Director or reported externally to a prescribed body (see Section 6).

Concerns may be raised verbally or in writing. Written concerns are encouraged as they provide a clear record. Anonymous disclosures are also accepted, though the BID's ability to investigate and provide feedback may be limited in such cases.

5. Confidentiality

Wrexham BID Ltd will make every reasonable effort to protect the identity of anyone raising a concern under this policy. Confidentiality will be maintained wherever possible. There may, however, be circumstances in which it is not possible to maintain confidentiality, for example where a disclosure requires formal investigation or legal proceedings. In such cases, the person will be advised before their identity is disclosed, wherever practicable.

6. External Reporting

In addition to raising a concern internally, workers may be entitled to make a protected disclosure to a prescribed external body. Relevant prescribed persons for a BID include:

- The Charity Commission (if the BID has charitable status).
- Companies House (for concerns about corporate misconduct).
- The Health and Safety Executive (for health and safety concerns).
- The Information Commissioner's Office (for data protection concerns).
- HM Revenue & Customs (for concerns about tax fraud).
- The Auditor General for Wales or Wales Audit Office (for concerns involving public funds).

A full list of prescribed persons is available at gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies.

7. How Concerns Will Be Handled

Upon receipt of a whistleblowing disclosure, the BID Manager or Chair will:

- Acknowledge receipt of the concern within **five working days**.
- Conduct an initial assessment of the concern to determine the appropriate course of action.
- Inform the person raising the concern of the proposed next steps, subject to confidentiality.
- Carry out or commission a proportionate investigation, or refer the matter to an appropriate external authority.
- Provide feedback on the outcome of the investigation, where possible and appropriate, within a reasonable timeframe.

The person raising the concern is not required to prove wrongdoing. A reasonable belief that the concern is genuine and in the public interest is sufficient.

8. Protection from Detriment

Wrexham BID Ltd is committed to ensuring that no one who raises a concern in good faith under this policy suffers any detriment as a result. Detriment includes: dismissal, demotion, disciplinary action, harassment,

victimisation, or any other unfair treatment connected with the disclosure.

Any employee who is subjected to detriment for making a protected disclosure may bring a claim to an Employment Tribunal under the Public Interest Disclosure Act 1998. The BID will take any such allegation seriously and will treat it as a disciplinary matter.

Note: This protection does not extend to disclosures made in bad faith, maliciously, or where the person does not have a reasonable belief in the truth of the information disclosed.

9. Untrue Allegations

If a person makes a whistleblowing disclosure which is subsequently found to have been made maliciously, without reasonable belief, or in bad faith, it may be treated as a disciplinary matter. This policy is not intended to be used as a means of making vexatious or personal complaints.

10. Review

This policy will be reviewed annually by the Board, or sooner following any significant disclosure or change in applicable legislation.