

Policy and Procedure



Protected Disclosure (Whistleblowing) and Support to People Reporting / Witnessing Suspected Wrongdoing

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Host Policy Unit: Dorset Police Legitimacy Team
Policy Owner: Head of Dorset Professional Standards
Policy Author: D/Inspector – Counter Corruption Unit

Applicable to:

Devon & Cornwall Police
Dorset Police
OPCC Devon & Cornwall
OPCC Dorset

Officers
Staff

Policy / Procedure	Government Security Classification	Handling Instructions	FOIA
Policy	Official	Suitable for Public Publication	Open
Procedure	Official	Suitable for Public Publication	Open

**PRINTED VERSIONS SHOULD NOT BE RELIED UPON. THE MOST UP TO DATE
VERSION CAN BE FOUND ON THE [FORCE DOCUMENT LIBRARY](#).**

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1.0 Introduction

All Force policies and procedures are written in line with the:

- [Force Purpose and Objectives](#) (DCP)
- [Force Vision, Purpose and Priorities](#) (DP)
- [Code of Ethics](#) (DP)
- [Code of Ethics](#) (DCP)
- [Standards of Professional Behaviour](#)
- [National Decision Model](#)
- [Authorised Professional Practice](#)

All Force policies and procedures are subject to Equality Impact Assessment and consultation and are written giving particular consideration to:

- [Equality Act 2010 including the Public Sector Equality Duty,](#)
- [Human Rights Legislation \(1998\)](#)

The Force is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. Our policies and procedures have been developed considering the principles of the General Data Protection Regulation (GDPR).

- [UK General Data Protection Regulation / Data Protection Act \(2018\)](#)

The following also apply in the development and review of policy and procedure

- [Freedom of Information Act 2000 \(FOIA\)](#)
 - [Government Security Classification \(GSC\)](#)
 - [Health and Safety at Work Act 1974](#)
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2.0 Policy Section

2.1 Purpose

The intention of this policy is to provide guidance in relation to the reporting of wrongdoing (commonly known as Whistleblowing) within the organisation and the protection of and support given to persons who make such disclosures.

This policy applies to all police officers, police staff and employees, including the extended police family and those working voluntarily or under contract to the Dorset Police, Devon and Cornwall Police.

This policy and procedure provides comprehensive guidance and outlines a protection of disclosure protocol for reports of wrongdoing.

Any whistleblowing matters will be promptly and effectively investigated whilst taking appropriate measures to ensure the reporting person suffers no detriment or threat of dismissal as a result of making what they reasonably believe to be a genuine disclosure and that anonymity is ensured in appropriate circumstances.

Both forces are fully committed to creating a culture where individuals are empowered, supported and actively encouraged to report possible wrongdoing.

All records created as a result of this document will be retained in full accordance with the [Joint Records Management Policy \(J-P-011\)](#).

2.2 Legal / Regulatory Basis

‘Whistleblowing’ (also known as ‘making a protected disclosure’) – All persons serving with the police are under a duty to report any improper conduct and to not remain silent if they witness or become aware of an area of concern about the behaviour or actions of another person serving in policing. Taking action in these circumstances is an important part of the responsibilities of a professional in policing and is critical in upholding public trust and confidence. This duty extends to both reporting the improper conduct of colleagues as well as organisational impropriety, where it is found.

As of 6th April 2026, whistleblowing safeguards extend to workers who report sexual harassment. The key legislative change under the Workers Protection (Amendment of the Equality Act 2010) Act 2023 strengthened protections making it explicit that workers who raise concerns (“blow the whistle”) about sexual harassment will be protected under whistleblowing legislation from both detriment and unfair dismissal.

There is specific legislation that provides details on what statutory protection is available, and further details can be found here:

[Home Office Statutory Guidance on Professional Standards, Performance and Integrity in Policing](#) at www.gov.uk or [Employment Rights Act 2025: Strengthening Protections for Whistleblowers Factsheet](#)

This policy will be applied to all reports of wrongdoing, improper conduct and whistleblowing, irrespective of whether the statutory protection is applicable. A breach of the standards of professional behaviour for police officers as defined in the Police (Conduct) Regulations 2020 as amended by the Police (Conduct) (Amendment)

Regulations 2024 or the Code of Conduct for Police Staff as defined in the Police Staff Handbook would amount to wrongdoing or improper conduct.

Where an individual has genuine concerns over the behaviour or practices of a colleague that may not immediately appear to amount to wrongdoing or improper conduct they are still encouraged to raise these concerns. The reporting methods detailed in the associated procedure can also be utilised for raising such concerns.

Where someone's concern generally relates to an individual's own employment position or personal circumstances then they should consider how it can be resolved through the force [Grievance Policy \(J-P-178\)](#).

Police officers are under a specific duty as set out in the Standards of Professional Behaviour contained within the Conduct Regulations to challenge and report improper conduct. This responsibility is set out and applied in the Code of Ethics and as such applies to all persons who serve in policing, irrespective of their role or status.

The procedure section sets out the ways in which members of the force can report wrongdoing to the force. However they may also make a report to a prescribed person, which in respect of the conduct of those serving in the police is the [Independent Office for Police Conduct \(IOPC\)](#).

Any individual raising a concern, which they reasonably believe to be true and in the public interest, must not suffer any detriment as a result of doing so, this includes disciplinary action being taken against them. However, there is no immunity from disciplinary action in respect of any other aspect of the reporter's behaviour, for example if they were involved in the misconduct they reported (or any other misconduct) or if their behaviour can properly be treated as separable from the making of the disclosure.

If an individual believes they have suffered a detriment as a result of reporting wrongdoing they should make contact with their force Counter Corruption Unit (CCU) immediately.

No officer, police staff member or employee must threaten or victimise an individual who has raised a concern in good faith. Any person involved in such conduct may be subject to disciplinary action.

The Code of Ethics are a series of guiding statements that should be used to help people in policing do the right things, in the right way, for the right reasons.

Everyone in policing routinely makes important decisions. We make these decisions because it is our duty to uphold the law, prevent crime and disorder, protect and reassure communities, investigate crime and bring offenders to justice.

The principle of policing by consent relies on the trust and confidence that the public has in the police service and the wider law enforcement community. The standards of professional behaviour provide a lawful framework and clear instruction on how to maintain the trust that communities hold in us.

Every member of the policing profession in Dorset and Devon & Cornwall are required to challenge and report suspected improper conduct. We all have a positive obligation

to question the conduct of colleagues that we believe falls below the expected standards and, if necessary, challenge, report or take action against such conduct.

The College of Policing (CoP) offers an online service that provides access to a consolidated body of guidance for policing called Authorised Professional Practice (APP). This enables officers, police staff and employees to access and search for the most up to date approved guidance, replacing a number of previously published NPIA and NPCC documents. Albeit there is no specific APP that relates to 'Whistleblowing' or reporting wrongdoing. Additional guidance can be found within the Home Office Statutory Guidance on Professional Standards, Performance and Integrity in Policing or at www.gov.uk (link above).

3.0 Procedure

This procedure outlines a protection of disclosure protocol for reports of wrongdoing to promote a culture that will prevent, discourage and detect wrongdoing within the organisation. The protocol will empower, support and encourage officers and police staff/employees to do the right thing, confident in the knowledge that they will receive appropriate support and protection and that the effect of disclosure will not result in a situation to their detriment, discrimination or threat of dismissal.

This procedure applies to all police officers, police staff and employees, including the extended police family and those working voluntarily or under contract to the Dorset, Devon and Cornwall Police.

This procedure is intended to:

- Provide clear and comprehensive instructions to members of the Force about the reporting of wrongdoing
- Clarify what is wrongdoing
- Explain how to report wrongdoing
- Explain how to deal with reports of wrongdoing
- Outline the support available to staff who report wrongdoing

3.1 Roles and Responsibilities

The following have specific responsibilities with regards to reporting wrongdoing:

- All Commanders and Senior Management Teams
- Professional Standards Department
- All line managers
- Investigating officers
- Legal Services Department
- HR Operations and the People Services Centre
- Occupational Health Support Unit Staff

This list is not exhaustive and specific roles and responsibilities can be found throughout.

3.2 Reporting Suspected Wrongdoing

There are many ways in which suspected wrongdoing can be reported, in person, or through a third party. The most common are:

- Through line management
- Through the Professional Standards Department
- **Devon and Cornwall** - The Counter Corruption Unit (CCU)
countercorruptionunit@devonandcornwall.pnn.police.uk
- **Dorset** - The Counter Corruption Unit (CCU)
CounterCorruptionUnit.Dorset@Dorset.PNN.Police.uk

- **Devon and Cornwall Police** - Confidential helpline - 01752 701527
- **Dorset Police** - Confidential helpline - 01202 222505
- The Vetting Unit
- Trade Unions, Police Federation and Staff Associations
- Mentors
- [Independent Office for Police Conduct](#)
- Crimestoppers – 0800 1114444
- Confide in us (Devon and Cornwall) confidential reporting system – [access here](#)
- Confide in us (Dorset) confidential reporting system – [access here](#)
- The Police Anti-Corruption and Abuse Reporting Service (0800 085 0000) - [The Police Anti-Corruption and Abuse Reporting Service | Crimestoppers](#)

Listed above are a number of external agencies who can assist reporting persons, should they feel concerned about disclosing any matters directly to Devon & Cornwall Police or Dorset Police. They may also contact another line manager where the problem concerns their direct line management.

It is recognised that officers and police staff / employees may feel difficulty in reporting certain incidents but are encouraged to remember the organisation we work for and our duty to do the right thing and to report wrongdoing. As highlighted above, one of the Standards of Professional Behaviour is to challenge and report improper conduct. This responsibility is set out and applied in the Code of Ethics and as such applies to all persons who serve in policing, irrespective of their role or status.

Not all reports of suspected wrongdoing will lead to a criminal or misconduct investigation; however this does not deter from the fact that all members of staff have a positive duty to report wrongdoing when they perceive it. The response from the Force will be proportionate and appropriate. The report and connected documentation will be treated as 'Official – Sensitive Information' as a minimum, or higher, as circumstances dictate.

Where a report of wrongdoing is made to a line manager the following action will be taken:

- Provide immediate reassurance and support to the reporting individual.
- Take any necessary action to secure and preserve evidence.
- Inform the Professional Standards Department (PSD) or their local Counter Corruption Unit (CCU) **Please note:** Dependent on the severity of the suspected wrongdoing the line manager should not make contact with HR Operations at this stage as all communications need to go through PSD / CCU

in the first instance. PSD / CCU may arrange for a nominated representative from HR Operations who will advise and co-ordinate any relevant HR activity as appropriate.

- Consider if the allegation amounts to a crime allegation - if so consider what actions may need to be taken immediately. If not uncertain or unfamiliar with crime investigations then seek guidance from PSD / CCU.
- Submit a report via the following means:
 - **E-mail** – Send to Professional Standards and/or the CCU.
 - **Confide in us** – A secure reporting system for Devon & Cornwall CCU.
 - **Confide in us** – A secure reporting system for Dorset Police.

The Professional Standards Department / Counter Corruption Unit will:

- Review the available information.
- Decide if the report is to be classified as wrongdoing or is a matter to be dealt with under a different policy, by HR or by local supervision.

And may,

- Decide on the appropriate level of investigation needed in consultation with the assessment unit of PSD and the HR Operations Team.
- Conduct the necessary elements of a discreet investigation if required.
- Conduct a risk assessment.
- Record their decisions and rationale using the NDM (National Decision Model).
- Consider and implement a mechanism for safe contact, either face to face or by other means.
- Consider agreeing terms and conditions for the reporter to ensure a safe and auditable structure is implemented to safeguard them.

Professional Standards Department / Assessment:

- Document decisions made regarding support measures for the person making the report and the initial steps taken / considered to support or protect the person making the report.
- Arrange for nominated HR professionals involvement through the HR Operations Team.
- Consider seeking advice from the Legal Services Department.

- Consider any necessary involvement from the Occupational Health Support Unit, where appropriate.

Whatever method is used to report the suspected wrongdoing the initial recipient of the report and subsequent investigator must take into account the wishes of the reporter / witness. The reporter may not wish for their staff association, trade union, line management, HR or occupational health to be notified. Whilst this may have an impact on the level of support provided, their wishes should where possible be respected.

3.3 Investigation Strategy

The investigation strategy must be proportionate to the classification of the report and level of investigation required.

The investigating officer has responsibility for:

- Complying with Force standards of investigation.
- Documenting the investigation strategy.
- Documenting decisions made, action taken / not taken and the reasons why.
- Documenting any views or suggestions made by the person making the report.
- Documenting the agreed level of confidentiality appropriate to the report.
- Agreeing the support given to the person making the report.

The needs of the service and public interest are of paramount concern, they are factors that must be considered by the investigating officer and may override the needs of the person making the report. Whilst there is no guarantee of anonymity in every case, the individual circumstances will be considered with decisions and rationale entered in the policy log. In the event that it is necessary to disclose the identity of the person who raised the concern then they will be notified in advance and options to support them discussed.

At the conclusion of the investigation the investigating officer must inform the person who made the report, of the outcome of the investigation.

3.4 Support Mechanisms for Persons who Report / Witness Suspected Wrongdoing

In order to be effective, the person making the report must be confident that they will be taken seriously and that the matter will be recorded and a decision made as to appropriate investigation at a local level. Equally important is the knowledge that they will receive support throughout the process, as appropriate. The responsibility for delivering that support will likely sit with the line manager of the person making the report. Where the line manager is subject of the report made, is otherwise involved in the report, or the reporting person does not wish them to be aware or be responsible for the support then another responsible manager will be nominated. In deciding this the wishes of the reporting person should be taken into consideration.

The Investigating Officer (IO) appointed to the case will work in liaison with HR Operations to ensure that all measures to support the individual have been reasonably considered.

The line manager or appointed welfare person, in consultation as appropriate with HR Operations, has an ongoing responsibility for:

- Assessing and taking steps to ensure that the person making the report is protected from victimisation, harassment or discrimination.
- Identifying any anonymity issues, and maintaining anonymity.
- Close liaison and communication with the investigating officer concerning the welfare and possible repercussions of the investigation.
- Considering referral to the Occupational Health Support Unit or the Force Employee Assistance provider, staff association and trade union.
- Monitoring the matter to ensure that this working practice is complied with.

Details of the support mechanisms available can be found in [Appendix A](#).

4.0 Monitoring and Review

Review and amendments will be coordinated by the Legitimacy Team.

The policy owner has overall responsibility for ensuring the content of this policy and procedure is appropriate and up to date.

This document will be reviewed annually and inline with the initial EIA process but is subject to review outside of these timescales where legislation / process changes are identified.

Please note: Where legislation / guidance changes have occurred / scheduled to occur or operational needs demand it, ahead of any revision, Dorset policies and procedures will be applied in line with prevailing legislation / guidance.

Feedback relating to this policy can be made in writing or by e-mail to:

Devon and Cornwall via Professional.Standards@devonandcornwall.pnn.police.uk
Dorset via complaints-misconduct@Dorset.PNN.Police.uk

We welcome any comments or suggestions you wish to share about the content or implementation of this procedure. If you would like to make contact to discuss further, please email: Policies@dorset.PNN.police.uk.

5.0 Related Links

Policy and Procedure

- [J-P-011 – Joint Records Management Policy](#)

SharePoint

- [Professional Standards Department - Home](#)
- [Notifiable Associations](#)
- [Notifiable Association Form](#)

Other

- [Home Office Statutory Guidance on Professional Standards, Performance and Integrity in Policing](#)
 - [Independent Office for Police Conduct \(IOPC\)](#)
 - [The HMIC Integrity Inspection](#)
 - [The Strategic Assessments on Corruption](#)
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6.0 Version History

Previous version history information is available via the Legitimacy Team.

Version: 2.0
Date: 26/01/2026
Reason for Amendments: Review completed. Updated to latest combined template.
Amended by: D/Inspector – Counter Corruption Unit
Approved by: HoD
Date Approved: 11/01/2026
Quality Assured: Legitimacy Team

Version: 2.1
Date: 26/03/2026
Reason for Amendments: Employment Rights Act updates – Whistleblowing protections relating to sexual harassment.
Amended by: Supt / Head of PSD (Dorset)
Approved by: Head of PSD (Dorset) / Legitimacy Officer
Date Approved: 04/03/2026
Quality Assured: Legitimacy Team

Version: 2.2
Date: 29/05/2026
Reason for Amendments: The ‘applicable to’ criteria has been revised to include the OPCC for Devon, Cornwall and the Isles of Scilly.
Amended by: Legitimacy Support Officer
Approved by: Legitimacy Officer / D&C OPCC HR Corporate Support Officer
Date Approved: 29/05/2026
Quality Assured: Legitimacy Team

7.0 Governance

Present Portfolio Holder: Deputy Chief Constable
Present Document Owner: Head of Professional Standards (Dorset)
Present Owning Department: Professional Standards

Appendix A

Support

The intention of this policy and procedure is to encourage "open" reporting, that is where the identity of the person making the report is known to their colleagues. However, it also allows for persons reporting wrongdoing to do so anonymously, where possible, or to have the information treated as confidential whilst still supplying their own details.

Individuals should be made aware that in the event of a trial, conduct proceedings, employment tribunal, or other internal / external proceedings anonymity may not be possible and cannot be guaranteed.

Whilst individuals who report wrongdoing should expect their information to be tested it is vital that they do not feel victimised by the process. To prevent this, appropriate support mechanisms must be implemented and their effectiveness monitored.

The support given to an individual who reports wrongdoing must be tangible and agreed from the outset. It must continue throughout the process and be reviewed to ensure that it is appropriate. The person's role will be considered as part of the support assessment.

The responsibility to protect the person from victimisation, harassment or discrimination does not end at the conclusion of the matter. Slang, negative or derogatory terms must not be used to describe a person who reports wrongdoing. Appropriate measures must be implemented and monitored.

Line Management or Appointed Person

First line managers or an Appointed Person should be ideally placed to provide frontline support to individuals who have reported wrongdoing, be their welfare lead and to monitor the effectiveness of the support measures. When a report is made it is crucial that the person making it is treated positively and reassured that they are doing the right thing. All supervisors or appointed persons have a responsibility to actively prevent the person making the report being victimised, harassed, discriminated against or suffer a detriment.

Whilst not exhaustive, the following should be considered:

- Encourage the person making the report to seek the assistance and support of their staff association or trade union.
- Where appropriate, liaise with HR Operations and monitor the process.
- Remain in close liaison with the investigating officer.
- Obtain specialist help from the Occupational Health Support Unit.
- Open reporting is encouraged and provides the most effective investigative options. However reports can be made in confidence but the person must be

told that the legal rules governing disclosure apply. For disclosure purposes confidential information will be handled in a similar way to criminal intelligence.

- Consider the appointment of an independent person to act as a welfare officer.

All support measures considered, should be documented. They must be reviewed and be considered again if circumstances change. It will not generally be the responsibility of PSD / CCU or the investigator to be accountable for the welfare and support provided to someone who reports/witness's suspected wrongdoing. PSD / CCU and the investigator need to retain a neutral position in the process, however they can assist the relevant line manager or welfare officer in providing updates and information to assist them in this task.

Persons Subject to Allegations of Wrongdoing

The rights and entitlements of the individual who is the subject of the report of wrongdoing are covered in the relevant regulations or force policy. This will include the right to disclosure of information, to be informed in full of the details of any allegation and representation by their trade union or staff association.

Individuals are entitled to receive support from their line manager and it is quite possible that this could be the same person to which the report was made. Ideally there should be separate support mechanisms for each party with similar offers of support made. That said, nothing in this working practice prevents a line manager from performing their role.

Head of Professional Standards Department

Additionally the Head of the Professional Standards Department can authorise additional support measures:

- Dependent on the level and seriousness of the wrongdoing reported and the degree of risk to the person making it, a senior manager can be appointed to oversee the matter. They will have responsibility for ensuring that appropriate support is provided and is effective.
- Additional support may be offered in exceptional cases. This will not extend to an amnesty in cases involving criminal offences by the reporter.

Policy File

A Policy file will be completed in all cases, it summarises what the person making the report can expect from the Force and what the Force expects of that person. It will be commenced by the PSD / CCU on receipt of the report and will include initial policy decisions taken by the person to whom the initial report was made. The policy file will pass to the investigating officer and will include any policy directions from the Head of Professional Standards or other relevant senior officer depending on the circumstances of the case.

Contact

It is crucial that a framework is created for contact between the investigating officer and the person making the report. Where applicable it should also include mentors,

trade union, staff associations, senior manager overseer or any agreed third party.

It should also cover the timescale for reviewing the statement and updating the person on the progress of the investigation.

The investigator should agree with the person making the Report, the frequency and method of ongoing communication. In addition key points in the investigation should also trigger enhanced communication. This could include and is not limited to:

- Formal interview of suspect(s)
- Key decision points, including determinations of Gross Misconduct and referral to CPS for criminal charges
- Discontinuation of criminal and/or misconduct proceedings/investigation
- Disclosure of evidence to the suspect/s
- Outcome of a hearing
- Outcome of any appeal

Risk Assessment

Depending on the nature of the investigation and who has knowledge it will be decided who is best placed to have responsibility for conducting a formal risk assessment in order to fully understand and devise measures to deal with possible consequences of making the report may have on the professional and private life of the person, it is necessary to discuss these implications and decide on the best course of action to deal with them.

Do they believe they are at risk in the workplace? If so, who from? Is there a risk to their home or to their family?

What steps will be taken to mitigate those risks and are there any other issues that should be considered?

The support measures agreed, those considered but not implemented and the reasons why and any that are refused by the person making the report must be recorded and considered.

It should also be pointed out that in the event of a prosecution, employment tribunal, misconduct hearing or similar, anonymity may not be available. Guarantees of anonymity should not be given, although all reports received should be treated as Official – sensitive information.

Individuals who have reported or witnessed suspected wrongdoing may be anxious about giving evidence in any subsequent criminal, conduct or employment proceedings. To assist individuals with this, consideration should be given to providing them with information on what format the proceedings will take, what protective measures may be available and where possible allow them to view the location and set up of the proceedings venue before giving their evidence.

Post Investigation Considerations

The possible impact on the welfare of those persons who either report, witness or are accused of suspected wrong doing should not be underestimated. Early consideration

should be given to what arrangements may be needed should the relevant parties remain working in the same location/department once all matters have concluded.

An individual should suffer no future detriment, discrimination or dismissal as a direct result of reporting wrongdoing.