

Ysgol Gymraeg Pwll Coch



Whistleblowing Policy 2026

Introduction

Whistleblowing is defined as:

"The disclosure by an employee or professional of confidential information relating to some danger, fraud, or other illegal or unethical conduct connected with the workplace, whether by the employee or their colleagues." (Public Concern at Work Guidance, 1997)

Statutory protection is provided to employees who whistleblow through the **Public Interest Disclosure Act 1998 (PIDA)**. PIDA protects employees from suffering detriment where they make a protected disclosure within the meaning of the Act and raise concerns about conduct or practices within the school that are illegal, corrupt, improper, unsafe, unethical, or amount to malpractice.

This policy applies to all school staff, including full-time and part-time employees, casual, temporary and supply staff, as well as individuals undertaking work experience within the school.

Aims and Purpose of the Policy

The Governing Body is committed to maintaining high standards in all aspects of the school and will treat whistleblowing as a serious matter. In line with its commitment to openness, integrity and accountability, staff members are encouraged to report concerns, which will be taken seriously, investigated, and followed by appropriate action where necessary.

The aims of this policy are to:

- Give staff confidence to raise concerns about conduct or practices that are illegal, corrupt, improper, unsafe, unethical, amount to malpractice, or are inconsistent with the school's standards and policies, so that they feel encouraged to act upon those concerns.
- Provide clear routes for staff to raise concerns.
- Ensure staff receive a response to concerns raised and information about any action taken.
- Provide assurance that staff will be protected from victimisation or discrimination when making a whistleblowing disclosure in good faith and within the meaning of PIDA.

This policy covers whistleblowing regarding allegations of:

- Illegal conduct.
- Miscarriages of justice in statutory or other proceedings.
- Failure to comply with a statutory or legal obligation.
- Mismanagement, malpractice, or potential malpractice.

- Health and safety matters, including risks to the public, pupils, and staff.
- Actions that have caused or are likely to cause environmental damage.
- Abuse of authority.
- Unauthorised use of public or other funds.
- Fraud or corruption.
- Breaches of financial regulations or policies.
- Abuse of any person.
- Actions that have caused or are likely to cause physical danger to any person or serious damage to school property.
- Sexual, physical, or emotional abuse of staff members or pupils.
- Unfair discrimination or favouritism.
- Racist incidents, actions, or racial harassment.
- Any attempt to suppress disclosure of any of the matters listed above.

PIDA sets out the full statutory rights and responsibilities of staff wishing to whistleblow. Staff who are uncertain about any aspect of PIDA should seek further advice.

Public Concern at Work is an independent charity providing free advice to individuals who wish to raise concerns about fraud or other serious malpractice (telephone: 0207 404 6609 or www.pcaw.co.uk). Staff may also seek advice from their trade union.

Protection from Victimisation, Harassment and Discrimination

The Governing Body will not tolerate harassment or discrimination against staff members who raise concerns in accordance with the provisions of PIDA. Any staff member who discriminates against or harasses another member of staff for raising a concern under the whistleblowing policy will be dealt with under the Governing Body's staff disciplinary procedures.

PIDA provides protection where a disclosure qualifies as a protected disclosure. Under PIDA, it is automatically unfair to dismiss or make an employee redundant because they have made a protected disclosure, and it is unlawful to subject them to any other detriment, such as demotion or disciplinary penalties. Where such action occurs, an Employment Tribunal has the power to order reinstatement, re-engagement, or compensation for successful claimants.

Confidentiality

The Governing Body recognises that staff may wish to raise concerns in confidence and will do its utmost to protect the identity of staff members who do not wish their name to be disclosed.

However, the investigation of concerns may reveal the source of information, and statements from the staff member may be required as part of the evidence, which could be seen by all parties involved. If an investigation leads to prosecution, the whistleblower is likely to be called as a witness in court. The Governing Body will not pressure staff to identify themselves and will carefully consider whether to continue investigating concerns made anonymously.

Anonymous Allegations

Staff should provide their names whenever possible, as anonymous concerns are generally less persuasive. Nevertheless, anonymous allegations will be considered under the whistleblowing procedure, particularly where they relate to the welfare of children.

When deciding whether to act upon an anonymous allegation, the Governing Body will consider:

- The seriousness of the issues raised.
- The credibility of the concerns.
- The likelihood of confirming the allegation through attributable sources.
- The quality and amount of information provided.

False and Malicious/Vexatious Allegations

If a staff member makes an allegation in good faith that is not substantiated following further investigation, the matter will be closed and no further action will be taken.

However, where an investigation shows that false allegations were made maliciously, vexatiously, or for personal gain, the Governing Body will consider taking disciplinary action against the member of staff concerned.

Allegations Relating to Child Protection Matters

Where a member of staff raises a concern relating to a child protection issue, the Headteacher or Chair of Governors should urgently consult the Local Authority Designated Officer (LADO) for child protection or, if unavailable, the designated manager for child protection within the authority's social services department. This will enable the appropriate procedures for handling such allegations to be implemented under the school's disciplinary procedures and the child protection procedures established by the Local Safeguarding Children Boards.

However, staff members may make a direct referral to the designated social services manager either before raising concerns with the Governing Body or

where the Headteacher or Chair of Governors fails to act after concerns have been raised and the staff member remains worried about the situation.

Procedure for Making a Whistleblowing Disclosure

You should raise your concern with your line manager, the Headteacher, the Chair of Governors, or the governor appointed with responsibility for whistleblowing.

The appropriate person will depend on the seriousness and sensitivity of the issue and who is believed to be involved.

If you feel unable to raise concerns within the school, you may raise them with an external body listed in the "Taking the Matter Further" section of this policy, including the Local Authority, Public Concern at Work and trade unions.

Where the concern relates to child protection, and you do not wish to raise it through the school, you must consult the Local Authority Designated Officer (LADO) for child protection or, if unavailable, the authority's designated social services manager for child protection.

If the concern requires the involvement of the Police or another statutory authority, the whistleblowing process will be suspended until the statutory authority has completed its investigation and confirmed that it is appropriate for the whistleblowing process to continue.

Where possible, concerns should be raised in writing to avoid misunderstanding. You should provide:

- The background and history of the concern.
- Names, dates, and locations where possible.
- An explanation of why you are concerned.

If you feel unable to put the matter in writing, you may raise your concern verbally and arrange a meeting with the appropriate person. You may also ask your trade union or professional association to raise the matter on your behalf or support you in doing so.

Response to Whistleblowing Concerns

The matter raised may:

- Require an internal investigation within the school.
- Be referred to the Police where it concerns alleged criminal activity.
- Be referred to the Local Authority officer responsible for complaints regarding financial management or financial propriety in schools.

- Be referred to the Local Authority Designated Officer (LADO) or designated social services manager where there are child protection concerns.

At this stage, concerns or allegations are neither accepted nor rejected.

Timescale for Response

The person appointed by the Governing Body to investigate whistleblowing concerns will normally provide a written response within **five working days** (except in cases of anonymous allegations), which will:

- Confirm receipt of the concern.
- Explain how the matter will be dealt with.
- Provide an estimate of the time required to give a final response.
- Advise whether any investigations have already taken place.
- Confirm whether further investigations will occur.
- Inform you of support available while the matter is under consideration.
- Maintain confidentiality where possible, while explaining that anonymity cannot always be guaranteed.

Investigation Process

The appointed person will:

- Investigate the allegation, gathering evidence and interviewing witnesses as necessary.
- Maintain confidentiality wherever possible while recognising that anonymity cannot be guaranteed.
- Where appropriate, refer the matter to the Local Authority officer responsible for financial management complaints.
- Refer concerns involving possible criminal conduct to the Police where appropriate.
- Refer child protection concerns to the Local Authority Designated Officer (LADO) or the authority's designated social services manager where appropriate.

The whistleblowing procedure will be suspended while statutory authorities carry out their investigations and until they confirm that it is appropriate for the whistleblowing process to continue.

If the appointed investigator needs to meet with you, you may be accompanied by a trade union representative, professional association representative, or a colleague not connected with the area of work to which the concern relates.

Target for Completing the Investigation

The target is to complete an investigation within **10 to 15 working days** of the date of the initial written response.

Where an investigation extends beyond this timescale for specific reasons, all relevant individuals will be informed in writing and given an indication of when the investigation is expected to be completed.

Investigation Report

Following completion of the investigation, the appointed person will prepare a written report and submit it to the Chair of Governors, normally within **five working days**.

The report will not contain the whistleblower's name unless you have specifically requested to be identified.

Upon receipt of the report, the Chair of Governors will convene a committee consisting of at least one other governor and an independent individual from outside the Governing Body, such as a Local Authority representative or governor from another school. The committee will consider the investigation report and determine what action should be taken. This should normally occur within **5 to 10 working days** of receipt of the report.

Following the committee's decision, the Chair of Governors will normally notify you of the outcome within **five working days** (except in relation to anonymous allegations), including:

- Any action that will be taken; or
- Confirmation that no further action will be taken and the reasons why.

Taking the Matter Further

If no action is taken and/or you are dissatisfied with how the matter has been handled, you may make a complaint under the Governing Body's complaints procedure or raise your concerns with one of the following organisations:

- The Local Authority.
- The Diocesan Authority (for church schools).
- A relevant professional body or regulatory organisation such as the General Teaching Council for Wales (GTCW) or the Wales Audit Office.
- The Children's Commissioner for Wales.
- The Public Services Ombudsman for Wales.
- Care and Social Services Inspectorate Wales.
- A solicitor.
- The Police, regarding concerns about criminal conduct.
- A trade union or professional association.

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