ST PETER'S RC
PRIMARY SCHOOL

Whistleblowing Policy

Approved by	Gareth Rein	Headteacher	Date: 07.10.25
Approved by	P McManus	Chair of Governors	Date: 07.10.25

1. INTRODUCTION

1.1. Workers are often the first to realise that there may be something significantly wrong within the Council, and under the Employees' Code of Conduct are required to report such matters. However, they may not express their concerns because they feel that-speaking up would be disloyal to their colleagues or to the Council. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

1.2. The Council is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect workers, and others that we deal with, who have serious concerns about any aspect of the Council's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

1.3. This policy document makes it clear that you can do so without fear of victimisation, subsequent discrimination or disadvantage. This Policy is intended to encourage and enable workers to raise serious concerns within the Council rather than overlooking a problem or blowing the whistle outside.

1.4. This policy has been discussed with the relevant trade unions and professional organisations and has their support.

2. AIMS AND SCOPE OF THIS POLICY

2.1 This policy aims to:

- encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice
- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in the public interest

2.2 The Whistleblowing Policy is intended to cover serious concerns such as:

- conduct which is an offence or a breach of law
- disclosures related to miscarriages of justice
- health and safety risks, including risks to the public, service users, as well as other employees
- damage to the environment
- the inappropriate or unauthorised use of public funds or other resources
- possible fraud and corruption
- abuse of clients, or
- other unethical conduct.

Who can raise a concern under this Policy?

2.3 The Policy applies to all:

- employees of the City of Cardiff Council
- employees of contractors working for the Council, for example, agency staff, builders and drivers
- employees of suppliers
- those providing services under a contract or other agreement with the Council in their own premises, for example, care homes
- voluntary workers working with the Council.

2.4 Contractors' staff - you should report any concerns to the Council under this Policy if your concern relates mainly or solely to the conduct of Council staff or matters for which the Council is responsible.

However, if your concern relates solely or mainly to the conduct of your own employer (the Council's contractor) or matters within its responsibility, you should first consider reporting your concerns to your own employer (as this is the simplest way to ensure you are legally protected).

If you do not feel able to raise your concerns with your employer, it may be appropriate to report to someone else, such as the Council, and you may still be legally protected, if you act responsibly in the ways set out by law. The independent charity, Public Concern at Work (contact details listed in the External Contacts List at the end of this Policy) can provide free confidential and practical advice on how best to raise a concern and minimise any risk to yourself.

2.5 Schools Staff* You should normally raise your concerns with your line manager, the head teacher, the Chair of Governors or another school governor at your school. Your school should have its own Whistleblowing Policy (which you can request from your head teacher or the Chair of Governors), and you should follow that policy.

If you feel unable to raise your concerns within your school, you should raise them with the Council (Assistant Director, Education and Lifelong Learning, 02920 872460) or another organisation (see External Contacts List at the end of this Policy), if appropriate. You may also wish to seek advice from the independent charity, Public Concern at Work.

* NB. Staff working at the Pupil Referral Unit are covered by the Council's Policy

This policy does not apply in the following circumstances:

2.6 Grievances

If you are an employee, there are existing procedures in place to enable you to lodge a grievance relating to your own employment. You should always use the Grievance Policy before this Whistleblowing Policy.

2.7 Elected Members Conduct

Concerns relating to the conduct of elected Members should be raised in accordance with the Members' Code of Conduct.

2.8 Complaints

This policy does not replace the corporate Complaint Policy which is concerned with addressing complaints from members of the public about Council services.

2.9 Other Services

If you have any concerns about a service provided by another organisation on behalf of the Council you should contact the service provider in the first instance. In cases where the Council contracts with a private organisation it may be appropriate to notify the relevant Service Area of the Council. In some cases it may also be necessary to inform the appropriate regulatory organisation.

Concerns raised under the Whistleblowing Policy may lead to other Council policies or procedures being instigated, in cases such as:

2.10 Concerns about children or vulnerable adults

(i) If any information raises concerns about harm or potential harm to any child, a child protection referral should be made immediately to the Children's Access Point or, if outside of office hours, to the Emergency Duty Team (please see Contact List at the end of this Policy) where an experienced Social Worker will ensure Child in Need or Child Protection Procedures are instigated if needed, and will provide you with any required advice and guidance.

(ii) If any information raises concerns about harm or potential harm to a vulnerable adult, these concerns should be reported immediately to the Protection of Vulnerable Adults (POVA) Support Tearn or, if outside of office hours, to the Emergency Duty Team (please see Contact List at the end of this Policy) where an experienced Social Worker will ensure that any appropriate procedures are instigated, and will provide you with any required advice and guidance.

(iii) If you have concerns about immediate danger needing an emergency response or if you think a crime is being committed, the police should be contacted on

101 or 999. You should never delay taking emergency action to safeguard a child or vulnerable adult.

2.11 Disciplinary matters

If a matter raised results in disciplinary action, the Council's Disciplinary Policy and Procedure will apply.

2.12 Fraud or Corruption

Where there is suspicion of any fraud, corruption or financial impropriety, your concerns will be investigated in accordance with the Anti-Fraud and Anti-Corruption Strategy.

2.13 For any concerns dealt with under paragraphs 2.10, 2.11 and 2.12 above, it is important to note that you will still be entitled to the protection given to whistleblowers in accordance with the terms of this Policy. If your concerns are being addressed or investigated under a different policy or procedure, for example, child protection procedures, you should be notified of this and, if you wish, you may check that your report has been recorded as a whistleblowing report under the protection of the Whistleblowing Policy. If there is any conflict between the provisions of the Whistleblowing Policy and any other relevant policy or procedure, the Monitoring Officer will determine which should prevail.

3. PROTECTION AND SAFEGUARDS AGAINST HARASSMENT OR VICTIMISATION

3.1 The Council is committed to good practice and high standards and wants to be supportive of employees and others covered by this policy.

Your legal rights

3.2 The Public Interest Disclosure Act 1998 provides legal protection, in certain circumstances, to workers making disclosures in the public interest about malpractice (referred to as 'Protected Disclosures'). The Act makes it unlawful for the Council to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

3.3 The Council recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and those for whom you are providing a service.

3.4 The Council will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action, including disciplinary action if necessary, to protect you when you raise a concern in the public interest.

Support to you

3.5 Throughout this process:

- you will be given full support from Senior Management
- your concerns will be taken seriously; and
- the Council will do all it can to help you throughout the investigation, e.g. provide advocacy services, interpreters etc.

3.6 If appropriate, the Council will consider temporarily re-deploying you for the period of the investigation.

3.7 For those who are not Council employees, the Council will endeavour to provide appropriate advice and support wherever possible.

3.8 Any investigation into allegations of potential malpractice will not influence or be influenced by other procedures such as investigations and hearings under the disciplinary, sickness, capability, redundancy or any other dismissal procedures that already affect you or may affect you in the future.

4. CONFIDENTIALITY

All concerns reported in the public interest will be treated in confidence and your identity will not be revealed without your consent, unless disclosure is required by law or is necessary for the Council to address the concerns. This will be discussed with you. You should appreciate that it may not be possible to properly investigate your concerns without revealing the source of the information, and you may be asked to come forward as a witness and give a statement as part of the evidence at the appropriate time.

5. ANONYMOUS ALLEGATIONS

5.1 This Policy encourages you to put your name to your allegation whenever possible. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Council. It should be remembered that wherever possible confidentiality will be preserved.

5.2 In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

5.3 The Council would prefer you to express your concerns anonymously, if necessary, rather than remain silent about wrongdoing within the Council.

6. UNTRUE ALLEGATIONS

If you make an allegation in the public interest, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an untrue allegation frivolously, maliciously or for personal gain, disciplinary or any other appropriate action may be taken against you.

7. DATA PROTECTION

The Council is committed to ensuring the safe and appropriate use of personal information in line with the principles of the Data Protection Act, and has adopted a Data Protection Policy and Procedure for this purpose. If you have any concerns regarding the processing of personal data, you should refer to the Data Protection Policy and Procedure and seek advice from the Council's Information Governance Manager, if necessary.

8. HOW TO RAISE A CONCERN

8.1 As a first step, you should normally raise concerns with your immediate manager or the next level of management. In some cases it may be more appropriate to raise concerns with someone more senior or directly with one of the internal contacts listed at the end of this document. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that your management is involved, you should approach the Chief Executive, the Section 151 Officer, the Monitoring Officer or the Audit & Risk Manager. If any information raises concerns about harm or potential harm to either children or vulnerable adults, then these concerns should be reported immediately to the Children's Access Point (CAP} or the POVA (Protection of Vulnerable Adults) Support Team as the case may be, or out of hours to the Emergency Duty Team.

8.2 Concerns may be raised verbally or in writing. If you wish to make a written report, you are invited to use the following format:

- the background and history of the concern (giving relevant dates); and
- the reason why you are particularly concerned about the situation.

The Council's Whistleblowing Report Form may be used (CIS document 4.C.241).

8.3 If your concern is raised verbally, a written note will be taken in line with the format above.

8.4 The earlier you express the concern the easier it is to take action.

8.5 Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

8.6 Advice or guidance on how to pursue matters of concern may be obtained from

your line manager or the people named in the Internal Contact List at the end of this document.

8.7 You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or have the same concerns.

8.8 You may invite your trade union representative or a work colleague to be present during any meetings or interviews in connection with the concerns you have raised.

9. HOW THE COUNCIL WILL RESPOND

9.1 The person to whom you report your concerns under this policy must, in turn, report them to the Monitoring Officer within five working days.

9.2 The Council will respond to your concerns. Do not forget that testing out your concerns is not the same as either accepting or rejecting them.

9.3 Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary process
- lead to other policies or procedures being instigated, such as child protection procedures
- be referred to the police
- be referred to the Wales Audit Office
- form the subject of an independent inquiry.

9.4 In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which the Council will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, child protection, vulnerable adults, discrimination or harassment issues) will normally be referred for consideration under those procedures.

9.5 Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

9.6 Within ten working days of a concern being raised, the Monitoring Officer will write to you:

- acknowledging that the concern has been received
- indicating how the Council proposes to deal with the matter
- giving an estimate of how long it will take to provide a final response
- telling you whether any initial enquiries have been made
- supplying you with information on support available to you, and
- telling you whether further investigations will take place and if not, why not.

9.7 The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and

the clarity of the information provided. If necessary, the Council will seek further information from you.

9.8 Where any meeting is arranged, off-site if you so wish, you can be accompanied by a union representative or a work colleague.

9.9 The Council will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Council will arrange for you to receive advice about the procedure.

9.10 The Council accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation but you must keep that information confidential.

10. MONITORING AND REVIEW

10.1 The Monitoring Officer has responsibility for the maintenance and operation of this policy. That officer maintains a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Standards and Ethics Committee.

10.2 The Standards and Ethics Committee is authorised on behalf of the Council to oversee and monitor the Council's Whistleblowing procedures and consider any ethical issues arising. The Committee will annually review the policy and its operation and make any necessary amendments, except for minor corrections and updates which may be made by the Monitoring Officer.

11. HOW THE MATTER CAN BE TAKEN FURTHER

11.1 This policy is intended to provide you with an avenue within the Council to raise concerns. The Council believes this is the most effective way to address your concerns and hopes you will be satisfied with any action taken. If you are not, and if you feel it is right to take the matter outside the Council, further possible contact points are given in the External Contact List at the end of this booklet.

11.2 If you raise your concerns outside of the Council with a 'Prescribed Regulator' (please see the External Contacts List), you will still be entitled to the statutory protection of the Public Interest Disclosure Act if you reasonably believe you have acted in the public interest, the information / allegations are true and the matter is within the responsibility of that Regulator. If you make a wider disclosure, for example, to the media, there is a risk that you may not be statutorily protected, depending on whether or not there is a valid cause to go wider.

11.3 If you do take the matter outside the Council, you will also need to ensure that you do not disclose information which should properly remain confidential. You will need to confirm this with the person or organisation you decide to contact. However, you should note that, by law, you cannot be prevented from making a

Protected Disclosure (an appropriate lawful disclosure under the Public Interest Disclosure Act) by any confidentiality clause in an agreement between you and your employer (for example, in a Settlement Agreement), and any such clause will be legally invalid.

11.4 You should take advice, for example, from the independent charity, Public Concern at Work (contact details listed in the External Contacts List below), before raising your concerns outside of the Council to make sure that you are protected.

ALN statement

St Peter's RC Primary School is committed to providing an inclusive learning environment in line with the Additional Learning Needs and Education Tribunal (Wales) Act 2018 and the ALN Code for Wales 2021. We are dedicated to identifying, assessing, and making provision for Additional Learning Needs at the earliest opportunity, working in collaboration with pupils, parents, and relevant professionals. Our approach is based on promoting equity, respecting diversity, and ensuring that all pupils are provided with opportunities to meet success.

UNCRC statement

St Peter's RC Primary School is committed to creating a community where children's rights are respected, upheld, and fulfilled. We aim to foster a rights respecting environment that empowers pupils to become active and responsible citizens. Through collaboration with pupils, staff, parents/carers and governors, we aim to embed the United Nations Convention on the Rights of the Child (UNCRC) into our policies and practice.

INTERNAL CONTACT LIST

Advice or guidance about how to pursue matters of concern may be obtained from any of the people named below:

Chief Executive	Paul Orders	029 2087 2401
Corporate Director, Resources and Section 151 Officer	Christopher Lee	029 2087 2300
Director of Governance & Legal Services	Jayne La Grua	02920 87 3860
Head of Finance/Audit Manager	Ian Allwood	029 2087 2248
Standards & Ethics Committee Chair (Independent)	Jason Bartlett	Contactable via Committee Services
Any Chief Officer or any local trade union official.		029 2087 2412

Concerns about harm or potential harm to either children or vulnerable adults should be reported immediately to:

The Children's Access Point (CAP)	029 2063 6490
POVA Support Team (Protection of Vulnerable Adults)	029 2053 6436
Emergency Duty Team (out of hours)	029 2078 8570
Operational Manager, Safeguarding Children and Vulnerable Adults	029 2087 3830

Concerns regarding the processing of personal data may be discussed with the Information Governance Manager, contactable on 02920 873317

EXTERNAL CONTACT LIST

If you have used the appropriate internal procedures and are not satisfied with any action taken in relation to your concerns and if you feel it is right to take the matter outside the Council, further possible contact points are given below. It is stressed that the list below is not exhaustive and you are free to contact any organisation which you feel will be able to deal properly with your concerns.

Prescribed Regulators
{Please see Policy paragraph 11.2}

A full list is available from the Independent charity, Public Concern at Work {contact details below), and includes the following:

Auditor General for Wales	029 2032 0500
Wales Audit Office Whistleblowers' Hotline	01244 525980
Public Services Ombudsman for Wales	0300 790 0203
Environment Agency 0800 807060 (24 hour line)	03708 506 506 or
Health and Safety Executive major incidents only) or www.hse.gov.uk	0845 300 9923 (fatal and
Care and Social Services Inspectorate for Wales	0300 062 8800
Children's Commissioner for Wales	01792 765600
Food Standards Agency	020 7276 8000 or 020 7270 8960 (emergencies only)

Information Commissioner	01625 545745
National Society for the Prevention of Cruelty to Children (NSPCC)	0808 800 5000
Older People's Commissioner for Wales	
Professional bodies	0844 264 0670
The Chartered Institute of Public Finance and Accountancy (Wales)	029 2052 3470
South Wales Police	101 or 999 (emergencies only)
Your local Citizens Advice Bureau	See Yellow Pages for local numbers
Your trade union	

If you are unsure whether or how to use this procedure or want independent advice, you may contact the independent charity Public Concern at Work on 020 7404 6609. Their lawyers can give you free confidential advice at any stage on how to raise a concern about serious malpractice at work.