



# **MODEL WHISTLEBLOWING POLICY**

**Reviewed by the Governing Body  
September 2021 – updated 2022**

## Whistleblowing Policy

### 1. Overview

- 1.1 This policy outlines what you should do if you suspect something happening at work is putting you or others in danger, or is illegal or unethical.
- 1.2 It is designed to provide assurance to employees that they can raise concerns about unethical behaviour without fear of victimisation, subsequent discrimination or disadvantage.
- 1.3 It applies to all employees, contractors, consultants, officers, casual and agency workers.

### 2. What is Whistleblowing?

- 2.1 Our aim is to maintain the highest standards of integrity in everything we do, but all organisations can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes. Should you have such concerns, we encourage you to report them immediately — this is called ‘whistleblowing’. You can be assured that we will take your concerns seriously, they will be thoroughly investigated, and you can be confident there will be no reprisals.

2.2 The types of concerns you may want to raise with us by whistleblowing include:

- any activity you suspect is criminal
- any activity you suspect puts health and safety at risk
- any activity you suspect may damage the environment
- any activity you suspect is a miscarriage of justice
- any activity you suspect breaches our policy on bribery and corruption
- any failure to comply with legal or regulatory obligations
- any failure to meet professional requirements
- any attempt to conceal one or more of these activities.

There is no need for you to prove that the concern you are alleging has occurred or is likely to occur; a reasonable suspicion will suffice, speak to one of

the prescribed people listed if you are not sure whether something you have become aware of is covered by this policy.

- a. Note that this policy does not cover anything to do with you personally — how other people are treating you, for example. For this, please refer to our policies on bullying and harassment and then to our grievance procedure for guidance on how to proceed [Employee Handbook](#). This whistleblowing procedure is primarily for concerns where the interests of others or of this Authority are at risk.

### 3. How to raise a whistleblowing concern

For your concern to be protected you should make it in the right way.

- .1 As a first step, you should normally raise concerns with your immediate manager or your Head of Service. If you work in a school you can contact the Headteacher, Mrs Thomas the Chair of Governors, The Venerable Paul Mackness or the Governor nominated for Whistleblowing, Canon Leigh Richardson. Councillors should raise concerns with the Monitoring Officer. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

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- Mrs Rachael Thomas, Headteacher, 01437 809200  
[ThomasR580@hwbcymru.net](mailto:ThomasR580@hwbcymru.net)
- The Venerable Paul Mackness, Chair of Governors, 01437 809200  
[MacknessP7@hwbcymru.net](mailto:MacknessP7@hwbcymru.net)
- Canon Leigh Richardson, Link Governor-Whistleblowing, 01437 720202  
[subdean@stdavidscathedral.org.uk](mailto:subdean@stdavidscathedral.org.uk)

- .3 If you are unable to speak with your line manager or Head of Service, either put your concern in writing, telephone or arrange to meet one of the following individuals known as a '**prescribed person**' for the purposes of Whistleblowing, who are able to receive your issue of concern and provide advice and guidance on the procedure:

- Ceri Davies, Head of HR, 01437 775862  
[Ceri.davies@pembrokeshire.gov.uk](mailto:Ceri.davies@pembrokeshire.gov.uk)
- Jon Haswell, Director of Finance , 01437 775839  
[Jon.haswell@pembrokeshire.gov.uk](mailto:Jon.haswell@pembrokeshire.gov.uk)

- Claire Jones, Monitoring Officer, 01437 776564  
[Claire.Jones@pembrokeshire.gov.uk](mailto:Claire.Jones@pembrokeshire.gov.uk)

- .4 Where the concern relates to a **child protection matter**, you must consult the Authority's **Child Care Assessment Team asking for the Duty Manager on 01437 776444, Out of Hours Team on 0300 333 2222** if outside of normal working hours. Email: [CCAT@pembrokeshire.gov.uk](mailto:CCAT@pembrokeshire.gov.uk)

They will in turn inform the designated lead on child protection for the Authority, Diane Beacroft Service Manager Safeguarding & Quality Assurance [diane.beacroft@pembrokeshire.gov.uk](mailto:diane.beacroft@pembrokeshire.gov.uk) Diane Beacroft will ensure the link with the relevant prescribed person as appropriate.

- .5 For all concerns, if you are a member of a Trade Union, you can contact your Branch Representative or Regional Office, who you may invite to raise a matter on your behalf.
- .6 You can contact the HR Advisory team directly.
- .7 Your letter should say that you are raising your concerns under this policy, you should include:
- i. the background and history of the concern (giving relevant key facts, names of the people involved, dates and places);
  - ii. the reason why you are particularly concerned about the situation.

#### **4. How the Authority will respond**

- 4.1 A member of the HR Advisory team, trained in Whistleblowing Procedures, together with the appropriate manager will invite you to a meeting to discuss your concerns, and you are entitled to be accompanied at this and any subsequent meetings by a colleague or trade union representative. If you bring a companion, you must both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.

There should be no delay to *the invitation* to a meeting beyond 7 calendar days of receiving your issue of concern.

- 4.2 After the initial meeting, we will investigate your concerns and we may ask you to attend further meetings. To investigate properly, we may involve specialists with particular knowledge or experience of the issues you have raised. As part of this process a 'Terms of Reference' will be drawn up and a timeframe agreed upon.

- 4.3 You will be kept informed about how our investigations are progressing and how long they are likely to take, how and when we update you will be agreed in the initial meeting. Sometimes, however, we may be unable to give you details about the investigation (or any action it leads to) as we need to protect confidentiality. We understand this may be frustrating and give you concerns about whether we have actually done anything, and if this happens we will do our best to explain why we are acting in the way we are.
- 4.4 Your concerns will be addressed fairly, but we cannot guarantee the outcome of our investigations will be the one you want. If you are not satisfied with how we have conducted the investigations, you can take the matter to one of our directors for further consideration.
- 4.5 In the case of an allegation against an elected member, then the matter will be considered, in the first instance, by the Monitoring Officer or Chief Executive, who may refer the matter to the Public Services Ombudsman for Wales (if appropriate).
- 4.6 Concerns or allegations which fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.
- 4.7 The Authority will not tolerate any harassment or victimisation of “whistleblowers” including informal pressures, and will treat this as a serious disciplinary offence which will be dealt with under the relevant disciplinary rules and procedures. If you are subject to any detrimental treatment as a result of “whistleblowing” it should be raised immediately with the line manager so that the matter can be investigated thoroughly without undue delay.

## **5. Confidentiality and anonymity**

- 5.1 There is a significant difference between wanting to keep your concerns confidential and making a disclosure anonymously. We actively discourage anonymous whistleblowing.
- 5.2 You are always encouraged to raise concerns openly, and if you prefer to do so in confidence we will do all that we can to ensure your identity remains hidden. We may want to disclose your identity to people involved in the investigation, but will always discuss this with you first.
- 5.3 You are protected from reprisals under this policy (see paragraph 4.7), but if you are still worried we encourage you to discuss this with us and we will explore how far we can go in keeping your concerns confidential.

- 5.4 If you are considering expressing your concern anonymously, please reconsider, as such concerns are much less powerful and generally are difficult to substantiate. Also if no-one knows who provided the information it is not possible to reassure or protect you. If, after taking the necessary advice, (see Section 8) you still do not want to put your name to the disclosure, barring any alternative, then you should do so anonymously. Where evidence is available to verify an allegation, such a concern will be investigated.

## 6. How the matter can be taken outside the Authority

This policy is intended to provide you with an avenue within the Authority to raise concerns. If you feel it is right to take the matter outside the Authority there are prescribed routes. The following are appropriate contact points:

- To make a disclosure to the Auditor General for Wales under the Public Interest Disclosure Act 1998, contact the PIDA Officer via:

**Email:** [whistleblowing@audit.wales](mailto:whistleblowing@audit.wales)

**Telephone:** 029 20 320 522

[Audit Wales Whistleblowing](#)

- Police
- **External Prescribed Persons and Bodies:** The attached link provides a list of the prescribed people and bodies you can make a disclosure to. If you decide to blow the whistle to a prescribed person other than your employer, you must make sure that you have chosen the correct person or body for your issue. The schedule of prescribed persons can be accessed via this web link: [blowing-the-whistle-to-a-prescribed-person.pdf](#)

## 7. Untrue Allegations/Misuse of Procedure

Most concerns are raised with us in good faith, but occasionally someone makes a false allegation out of malice or because they believe they have something to gain. Anyone found doing this will face action under our disciplinary policy and may be disciplined for misconduct, or even dismissed for gross misconduct.

## 8. Independent Advice on making a disclosure

If you are thinking about making a disclosure and you are not sure what your legal rights are, you should consider getting independent advice. There are a number of avenues through a number of different external agencies:

- **Trade Union:** irrespective of which Trade Union you are a member of the universal advice would be for you to seek advice and involve the local branch and regional office before making any disclosure.

[UNISON guidance on whistleblowing](#)

- **Protect:** is a whistleblowing charity that offers free, confidential advice to people who are unsure whether or how to raise a whistleblowing concern at work. (Previously known as Public Concern at Work).

There are a number of whistleblowing case studies on this site demonstrating the types of wrongdoing whistleblowers are worried about

[Protect](#)

Their Whistleblowing Advice Line is managed by lawyers **020 3117 2520**

- **NHS whistleblowing helpline** is available to social care staff. [speakup.direct](#) the whistleblowing helpline is open Mon to Fri 8am to 6pm **08000 724 725**. You can contact the helpline if you have concerns and are unsure how to raise them or simply want advice on best practice in safeguarding.

## 9. Whistleblowing Champions

The Authority has appointed two whistleblowing champions to raise the profile, promote awareness and ensure appropriate governance of the Policy.

Cllr Vivien Stoddart [Cllr.Vivien.Stoddart@pembrokeshire.gov.uk](mailto:Cllr.Vivien.Stoddart@pembrokeshire.gov.uk)

Ceri Davies, Head of HR [Ceri.Davies@pembrokeshire.gov.uk](mailto:Ceri.Davies@pembrokeshire.gov.uk)

If you have views on how the Policy could be improved they would welcome your feedback.

## 10. Final Reminder – “Do’s and Don’ts”

### **Do's**

- Make an immediate note of your concerns (i.e. times, dates, witnesses).
- Convey your suspicions to someone with appropriate authority and experience.
- Deal with the matter promptly.
- Seek advice from management and/or a recognised trade union.

### **Don'ts**

- Do nothing.
- Be afraid of raising your concerns.
- Approach or accuse any individuals directly.
- Try to investigate the matter yourself.
- Convey your suspicions to anyone other than those with proper authority

The Code should be read in conjunction with the Counter Fraud, Corruption and Bribery Strategy 2015-17 and the [Code of Conduct](#) on the Employee Handbook

There is a Whistleblowing e-learning package available on Pembrokeshire learning pool that all employees are required to complete.