





Clybiau Llywodraethwyr a  
Chylch Chwarae

**Gresffordd Gresford**

Governors' Clubs and Playgroup

# Whistleblowing Policy

<b>Equality Act Impact Assessment</b>	<b>YES</b>	NO	Ionawr 2025
<b>Last Review Date</b>	Ionawr 2025		
<b>Date to be reviewed</b>	February 2026		
<b>Date Adopted by Management Committee</b>	19.02.2025		
<b>Responsible Individual - Mr Richard Hatwood</b>			
<b>Chair of Management Committee – Mrs Jan MacDonald</b>			

## **1. Purpose**

The purpose of this policy is to provide a safe and confidential environment for GGCP staff, trustees, volunteers, and others to raise concerns about serious wrongdoing within the organisation. This policy aims to encourage and protect individuals who disclose concerns in the public interest and ensures GGCP operates transparently, ethically, and lawfully. This policy aligns with the Public Interest Disclosure Act 1998 and other relevant UK legislation.

## **2. Scope**

This policy applies to all GGCP staff, trustees, volunteers, and others associated with GGCP, including contractors. It covers disclosures made in the public interest regarding suspected wrongdoing, malpractice, or risks to health, safety, or the environment. This policy does not apply to personal grievances, which should be raised through GGCP's Grievance Policy.

## **3. Policy Statement**

GGCP is committed to:

- Operating with integrity and accountability and encouraging the disclosure of any potential wrongdoing.
- Protecting individuals who raise genuine concerns in good faith, ensuring they do not face retaliation.
- Investigating all whistleblowing disclosures thoroughly, fairly, and in a timely manner.

## **4. Legal Framework**

This policy is designed to comply with:

- The Public Interest Disclosure Act 1998
- The Employment Rights Act 1996
- The Equality Act 2010
- The Data Protection Act 2018 (GDPR)

## **5. Definition of Whistleblowing**

Whistleblowing refers to the act of reporting suspected or actual wrongdoing or risks that affect others, such as:

- Criminal activity: Including fraud, theft, or any activity that violates the law.
- Health and safety risks: Including activities or conditions that endanger staff, children, or others.
- Environmental damage: Activities that harm or risk the environment.
- Failure to comply with legal obligations: Such as breaches of safeguarding responsibilities or data protection laws.
- Miscarriages of justice: Any actions that lead to or cover up unfair treatment or injustice.
- Financial mismanagement or misappropriation of funds: Including misuse of GGCP's resources or funds.

## **6. Protection for Whistleblowers**

GGCP is committed to protecting individuals who raise genuine concerns from any form of retaliation or unfair treatment. Protection under this policy includes:

- Confidentiality: GGCP will keep the whistleblower's identity confidential to the extent possible, unless required by law or with the whistleblower's consent.
- Protection from Retaliation: Individuals will not be subject to dismissal, demotion, disciplinary action, or any adverse treatment for raising concerns in good faith.
- Support: GGCP will provide support to whistleblowers throughout the process and protect their well-being.

## **7. Raising a Concern**

### **7.1 Reporting a Concern Internally**

- Individuals are encouraged to raise concerns with their line manager or the Designated Safeguarding Lead (DSL) in the first instance, if appropriate.
- If the individual feels uncomfortable raising the concern with their line manager or DSL, they may report it directly to the Chair of Trustees.

### **7.2 Reporting a Concern Externally**

- If an individual feels unable to raise the concern internally, they may report it to an external body, such as:

- Care Inspectorate Wales (CIW): For concerns related to childcare and safeguarding.
- Charity Commission: For concerns related to governance and misuse of charity funds.
- Health and Safety Executive (HSE): For concerns related to health and safety.

### **7.3 Anonymous Reporting**

- While individuals are encouraged to identify themselves when raising concerns, GGCP will investigate anonymous disclosures where possible. However, anonymous reports may limit GGCP's ability to conduct a thorough investigation.

## **8. Procedure for Handling Whistleblowing Disclosures**

### **8.1 Acknowledging the Disclosure**

- GGCP will acknowledge receipt of a disclosure within five working days and inform the whistleblower of the initial steps to be taken.

### **8.2 Initial Assessment and Investigation**

- GGCP will conduct an initial assessment to determine the nature and scope of the concern and whether a formal investigation is warranted.
- If an investigation is needed, GGCP will appoint an impartial investigator (internal or external) to review the evidence, interview relevant individuals, and determine the facts.

### **8.3 Outcome and Resolution**

- The whistleblower will be informed of the outcome of the investigation, subject to legal and confidentiality considerations.
- If the investigation finds that wrongdoing has occurred, GGCP will take appropriate action, which may include disciplinary measures, policy changes, or referrals to external authorities.

## **9. Confidentiality and Record-Keeping**

- GGCP will handle all whistleblowing disclosures with the utmost confidentiality. Information will be shared only with those directly involved in managing and investigating the concern.
- Records of whistleblowing disclosures, investigations, and outcomes will be securely stored and retained in line with data protection regulations.

## **10. Support and Well-Being**

GGCP recognises the courage it may take to raise a concern and is committed to supporting whistleblowers through:

- Providing guidance and reassurance throughout the whistleblowing process.
- Offering access to support services or resources if necessary to support their well-being.
- Ensuring that whistleblowers can continue their role at GGCP without fear of adverse treatment.

## **11. False or Malicious Allegations**

If an investigation reveals that an allegation was made maliciously or in bad faith, GGCP may consider disciplinary action against the individual making the claim. This policy is intended to support genuine whistleblowing and must not be misused.

## **12. Policy Review**

This policy will be reviewed annually by the Board of Trustees or sooner if necessary to reflect changes in legislation or GGCP's organisational needs. Any updates will ensure continued compliance with whistleblowing legislation and best practices.

## **13. Compliance with Legislation**

This policy complies with:

- The Public Interest Disclosure Act 1998
- The Employment Rights Act 1996
- The Equality Act 2010
- The Data Protection Act 2018 (GDPR)

## **14. Contact Information**

For further information on this policy or to report a whistleblowing concern, please contact:

- Chair of Trustees: Mrs Jan MacDonald (01978 852342 or [playgroup@allsaints-pri.wrexham.sch.uk](mailto:playgroup@allsaints-pri.wrexham.sch.uk))
- Responsible Individual: Mr Richard Hatwood (01978 852342 or [headteacher@allsaints-pri.wrexham.sch.uk](mailto:headteacher@allsaints-pri.wrexham.sch.uk))