Whistleblowing Policy and Procedure

Formally adopted by the Governing Board	
Mrs N Hall **Mrs H McConnell**	**Headteachers**
Mr D Hall	**Chair of Governors**
September 2026	

Next review September 2027

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1. Introduction

Department for Education (DfE) guidance for schools on whistleblowing states that governing boards of maintained schools are responsible for agreeing and establishing the school's whistleblowing procedure which should be based on the Local Authority procedure. This document is based on the Norfolk County Council procedure.

In line with DfE guidance, the governing board must appoint at least one named member of staff and one named governor to be whistleblowing contacts. These contacts should be agreed at a governing board meeting, formally recorded within the minutes and identified in Appendix 1 of this policy.

To ensure confidentiality, any email address provided by the whistleblowing contacts in relation to this policy, must not be accessed by any other person other than themselves. For example, if the Chair of Governors is a nominated contact, the email address inbox provided for the purposes of this procedure should not be accessible by the Clerk to Governors.

Access to whistleblowing records must be strictly limited to authorised contacts only – Headteachers must ensure that the governors and designated member of staff can manage these records independently, without relying on clerks or administrators.

The Headteachers should look to include whistleblowing guidance on non-safeguarding issues (e.g. financial irregularities, fraud, health and safety concerns) in annual training sessions or consider implementing dedicated whistleblowing training to reinforce understanding beyond safeguarding contexts.

As a governing board, we are committed to providing a safe, supportive, open, honest and inclusive working environment. It is important that workers feel confident and able to raise any concerns they may have.

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A worker may be concerned about what has happened to them or their colleagues, something they have seen, heard, or been asked to do or something that is not happening when it should. It is our aim to continue improving the services we provide, how we conduct our business, and the safety and wellbeing of all those within the workplace. We therefore consider the open and honest raising of concerns to be essential in meeting strategic goals, uncovering or preventing wrongdoing and reflecting our school values.

It is natural to feel uncomfortable about raising concerns at work. A worker may be worried about negativity from peers, their concerns not being taken seriously, or suffering recriminations such as bullying, harassment or even losing their job. The purpose of this policy is to address those concerns and assure all workers that we will act upon these with the intention of reaching a resolution. We will listen to and consider any concerns raised under this Policy (or any other), where appropriate investigate those concerns as soon as possible and provide access to support where needed.

We believe that anyone who raises any type of concern about work that they believe to be true, should be treated with respect, and should not suffer as a result.

Through visible leadership at all levels, we will actively promote this policy to all workers, to welcome disclosures, provide training and will act against those who may seek to obstruct or ignore this policy or who harass or victimise anyone raising genuine concerns.

The governing board and Headteachers will:

- lead and re-enforce a culture which promotes openness and transparency.
- lead a co-ordinated, efficient response, ensuring that concerns are fully investigated.
- ensure that action is taken on any findings and any lessons are shared and learned; and
- provide assurance that those who raise concerns are reassured and that the policy has been followed.

2. What is Whistleblowing and what is covered?

Whistleblowing is the term used to describe the disclosure of information about suspected wrongdoing or dangers identified at work.

We believe that anyone who raises any type of concern about work that they believe to be true, should be treated with respect, and should not suffer as a result. Certain types of wrongdoing or dangers that can be reported as whistleblowing are set out in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998 and the Employment Rights Act 2025). Those concerns are as follows:

- any criminal offence (such as fraud or theft)
- sexual harassment
- any breach of a legal obligation or duty
- a miscarriage of justice
- a danger to the health and safety of any individual
- damage to the environment

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- deliberate concealment of information tending to show any of the above matters.

A worker who reasonably believes that one of the above concerns is either happening now, took place in the past, or is likely to happen in the future is making a 'qualifying disclosure' (and discloses information regarding the matter to the appropriate person or body). These workers will be 'protected' from detrimental treatment or victimisation from their employer. These are called "protected disclosures", further information on the protection for workers can be found in section 4 of this policy.

Whistleblowers are protected by law - they shouldn't be treated unfairly or lose their job because they 'blow the whistle'.

In some cases, a protected disclosure may be investigated under a separate policy of the school where appropriate, for example, an allegation of sexual harassment is likely to qualify for protection as it will be with reference to an unlawful or potentially criminal act. In these cases, the Bullying and Harassment Policy and Grievance policy and procedure will be used as the internal mechanism for dealing with the concern in the first instance. The Code of Conduct will be considered in all cases.

Other concerns, that may not be qualifying, which however may meet the public interest criteria, could relate to value for money concerns, or poor contract management. While these may not have the same legal protection, we take these seriously and will investigate with a view to resolving those concerns.

Personal grievances and complaints are not usually covered by whistleblowing law. A member of a professional body may have a professional duty to report a concern. If in doubt, please raise it.

Information on who to report concerns to under this policy can be found in Appendix 1.

3. Raising a concern – who can raise whistleblowing concerns

This policy assists those who work for and/or with the school ("workers") to feel confident and secure with reporting any concerns that relate to section 2 above.

A worker is regarded as an employee of the school, contractor, consultant, student on work placement, volunteer, casual or agency worker. It also applies to suppliers to the school and to those providing services under a contract with the school in the premises of another contractor. A worker could also be someone working for an organisation working in partnership with the school.

Whistleblowing concerns can be reported to those stated in Appendix 1.

It is hoped that a worker would feel able to raise their concerns internally (i.e. to the nominated employee or governor), however if a worker feels they cannot discuss the issue internally or has good reason to consider that their complaint or disclosure will not be properly handled, then they can report their concerns direct to Norfolk County Council or other external prescribed person or body (listed at Appendix 1), a legal adviser, Trade Union representative or MP.

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If the concern relates to a child protection issue this should be reported to the Local Authority Designated Officer (LADO) and in line with the specific guidelines outlined in the school's safeguarding policy.

If we receive any disclosures relating to other organisations or institutions, we will acknowledge these and seek advice on an appropriate course of action on the matters raised.

Any so called 'gagging clauses' in settlement agreements do not prevent workers from making disclosures in the public interest.

Note:- Any member of the public wishing to raise a legitimate concern, should speak with the Headteachers (or Chair of Governors if the Headteachers are the subject of the complaint) in the first instance.

4. Protection for Whistleblowers

(The Public Interest Disclosure Act 1998 (PIDA) governs whistleblowing. PIDA came into force on 2 July 1999. It amends the Employment Rights Act 1996 and protects workers against dismissal or other penalties as a result of making a 'protected disclosure'.)

If a concern is raised by a worker in the reasonable belief that it is in the public interest and procedures have been followed correctly, the discloser raising the concern will be protected by the terms of this policy (confidentiality and anonymity) and, where applicable, by whistleblowing legislation.

Where a discloser raises concerns about being victimised for raising a concern by another worker, we will take appropriate steps to investigate such allegations and where appropriate; take action against those responsible in line with the disciplinary policy and procedures.

Where a discloser is an employee of an external organisation, we will signpost the individual to the appropriate organisation for further support and advice. Any disclosure of information received from a worker in relation to section 2 of this policy is likely to be considered a "Protected Disclosure". This means that workers who disclose information to a prescribed person or body in relation to the types of wrongdoing in section 2 above are protected by law. The worker will not be at risk of losing their job or suffering any form of reprisal as a result, so long as they have reason to believe the information provided is true. It does not matter if they are mistaken or if there is an innocent explanation for their concerns.

We do not require workers to obtain proof of wrongdoing or investigate the matter themselves prior to reporting a concern. We want workers to raise any concerns they have at the earliest opportunity so that they can be considered and hopefully resolved quickly. We are committed to dealing with any disclosure appropriately, consistently, fairly and professionally and no-one should feel that any issue or concern is not important enough be raised.

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We do not tolerate bullying, harassment or victimisation in any form, including to those who raise a concern in connection with the provisions of this policy. Furthermore, we will not tolerate any attempt to bully a worker into not raising any such concern. We have specific policies in place to deal with this type of behaviour such as the Discrimination, bullying and harassment policy P308. We consider behaviour of this nature to be a breach of our values and will take the appropriate action against those who fail to meet our behavioural requirements.

Whistleblowing laws provide the right for a worker to take a case to an employment tribunal if they have been victimised at work or they have lost their job because they have 'blown the whistle'.

Any worker who believes they have suffered a detriment for raising a concern under this policy should report this to any of the persons listed in Appendix 1.

5. Confidentiality and anonymity

We believe that any worker should feel confident and able to voice whistleblowing concerns openly under this policy. However, we accept that some workers may wish to raise a concern confidentially. This means that although the person a worker makes a disclosure to, will know who they are, the worker does not want anyone else to be made aware. If this is what the worker wants, every effort will be made to ensure their identity is not disclosed unless we are required to do so by law.

In some cases, it may not be possible to maintain confidentiality as a consequence of an investigation into the concerns raised. If this occurs, we will discuss this as soon as possible with the worker raising the disclosure, and aim to devise strategies for supporting them to ensure they suffer no detriment or harassment as a result.

Workers can raise anonymous concerns under this policy. This means that those dealing with the concern may not be able to contact them or gain any further information other than what they have provided from the initial disclosure. In these cases, it may be difficult to investigate the concerns raised due many factors, such as a lack of information about individuals, dates, times, locations or documents. There is a risk that genuine concerns raised anonymously may not result in a satisfactory outcome. For these reasons the recommended routes for raising a whistleblowing concern are via open or confidential reporting of information. Nevertheless, anonymous allegations will always be individually considered using the following guidelines:

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

Anonymous whistle-blowers may seek feedback through a telephone appointment or by using an anonymised email address.

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6. How to report a concern

In the first instance we would encourage a worker to raise any concern they may have either informally or formally with their line manager. Where the worker does not believe this to be appropriate, they can use any of the options set out in Appendix 1, although the preference is for matter to be raised with the nominated employee or nominated governor unless there is reason to raise with the external contact points. Whichever route the worker chooses, they will need to be ready to explain as fully as they can the information and circumstances that gave rise to their concern.

The law recognises that in some circumstances it may be appropriate for the worker to report their concerns to an external body such as a regulator. The government has produced a list of external bodies designated to receive external whistleblowing concerns. These are called prescribed persons, and the link to the list can be found in Appendix 1. In any case, those who wish to make a disclosure should do so using the school's internal procedures in the first instance.

It will very rarely (if ever) be appropriate to alert the media. Whistleblowing to the media is only protected under exceptional circumstances and there is a risk that such disclosure could mean that the rights and protections in law, of the person making the disclosure, are lost.

7. Getting advice

Before making a disclosure, the worker may first wish to discuss and seek advice about the concern on a confidential basis. These conversations may occur with a Well-being Adviser, HR representative, a trade union representative, solicitor or professional body. The discussions may help assess how justified the worker's concern is and, if they then wish to proceed, the most appropriate and effective way to report it. This is important because the report should be made so as to allow the most effective investigation, whilst affording the whistleblower protection under the law.

We strongly encourage workers to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. Their contact details can be found in Appendix 1.

8. How concerns are dealt with – managers duty to report

Leaders and line managers must be familiar with this policy and must notify the nominated employee via email within 24 hours when either of the following applies:

- A worker indicates they are "whistleblowing": and
- The content of the concern appears to meet the public-interest categories set out in section 2. (From 6 April 2026, disclosures about sexual harassment are expressly listed as qualifying disclosures.)

The purpose of notifying via this route is to provide a central, independent triage that protects the worker, ensures the correct procedure is used, and enables consistent oversight and learning. Leaders and line managers should take immediate steps to control urgent risks (for example, serious health and safety) where appropriate.

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9. How concerns are dealt with (the procedure)

We will respond to a worker's concern to acknowledge it has been raised as soon as possible, usually within three school days of receipt.

Upon receipt of a concern, we will discuss this with the worker making the disclosure and make initial enquiries to decide whether an investigation is appropriate and, if so, what form it should take. This will include an assessment of whether the concern should be investigated under any of the school's other policies and procedures.

Any initial meeting under this policy can be arranged away from the workplace, if the worker wishes, and a union or professional association representative or a friend may accompany them in support.

Where appropriate, the matters raised may:

- be investigated by the school's management, NCC internal audit or other specialist team, or through appropriate policies and procedures.
- be referred to the police
- be referred and put through established child/adult protection procedures
- form the subject of an independent inquiry

We will also consider whether the concerns may be resolved via other mechanisms such as mediation, training or review or any other form of dispute resolution.

Where we can, we will acknowledge the allegation in writing within ten days confirming:

- How we propose to deal with the matter.
- How long we estimate that will take to provide a final response.
- Whether any initial enquiries have been made.
- Whistleblower support mechanisms; and whether further investigations will take place and if not, why not.

Any investigation will be proportionate, independent, objective and evidence-based, and may produce a report that focuses on identifying and rectifying any issues and learning lessons to prevent problems occurring.

In respect of disclosures of serious misconduct or wrongdoing relating to safeguarding children and or special educational needs; we have a legal obligation to investigate and will do so. The County Council also has a legal obligation to investigate any complaints it receives about schools and will do so irrespective of the status of any school or relevant organisation.

We will do what we can to minimise any difficulties that the worker may experience as a result of raising a concern. For instance, if they are asked to give evidence in criminal or disciplinary proceedings, we will arrange for them to receive appropriate advice and support.

The worker raising the concern needs to be assured that their disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, they will be kept informed of the progress and outcome of any investigation.

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However, sometimes the need for confidentiality may prevent us giving them specific details of the investigation or any disciplinary action taken as a result. All involved, including the worker, should treat any information about the investigation as confidential.

Norfolk Support Line Service is available to support workers if they require it.

10. Training, promotion and reporting

The provisions of this policy will be promoted throughout the school and where appropriate, training and advice will be provided at all levels to those charged with dealing with and investigating whistleblowing concerns.

This policy will also be published on the school's website so that it can be accessed by all who do business with the school.

11. Monitoring and review

In line with best practice, the nominated employee and nominated governor will record the number of whistleblowing disclosures received and their nature. We will maintain records of the date and content of feedback provided to whistleblowers and may conduct regular surveys to ascertain the satisfaction of whistleblowers.

Protocols for reporting and evaluating the effectiveness of this policy will be developed by the governing board. This policy will be reviewed annually and updated appropriately.

12. Data Protection

Personal data collected and processed for the purpose of this policy and procedure will be handled in accordance with the data protection policy and applicable statutory obligations. Any personal data collected is held securely and accessed by, and disclosed to, individuals only for the purposes of worker management or to comply with statutory reporting obligations. Inappropriate access to, or disclosure of, personal data constitutes a data breach and should be reported without delay, in accordance with the data protection policy. It may also constitute a disciplinary offence in which case it would be dealt with under the disciplinary policy and procedure.

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Appendix 1 – List of Whistleblowing Contacts

Headteachers or designated staff member responsible for Whistleblowing
Mrs Natasha Hall or Mrs Hannah McConnell
Tel: 01508 570326
Email: head@mulbartonprimary.norfolk.sch.uk

Designated Whistleblowing Governor
Mr David Hall. Chair of Governors
Tel: 01508 570326
Email: chair@mulbartonprimary.norfolk.sch.uk

Norfolk County Council's Report Concerns Whistleblowing Contact Service
Tel: 01603 224433
Email: reportconcerns@norfolk.gov.uk

Norfolk Local Authority Designated Officer for Child Protection (LADO)
Tel: 0344 800 8020
Email: LADO@norfolk.gov.uk

Public Concern at Work
Helpline: 020 3117 2520
Website: www.protect-advice.org.uk

For a list of Prescribed Persons for external disclosures please visit whistleblowing list of prescribed people and bodies

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Appendix 2 – Table of changes

Date of change	Paragraphs affected	Summary of update
09/07/2026	All	Updated to reflect updated NCC policy and findings from 2026 thematic audit.
13/05/2026	2 and Appendix 1	Updated to require names of in school Whistleblowing contacts and details added for Norfolk County Council contacts
07/05/2019	All	New and updated version created to reflect the revised Norfolk County Council procedure, including changes in Whistleblowing legislation. These changes require disclosures to be made in the public interest but no longer require disclosures to be made in good faith.

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