# Whistleblowing Policy

**Navenby CE Primary School has adopted the Lincolnshire County Council policy in its entirety. This policy was approved by the full Governing Body at their meeting on 1st October 2026 and will be reviewed every two years in line with County.**

**Introduction**

Lincolnshire County Council want to make sure that they are providing excellent services to the residents of Lincolnshire. Their staff, Councillors, partners and contractors have an important role to play in achieving this goal and they expect everyone to be committed to their high standards of service which are based on the principles of honesty, openness and accountability.

They know that they face the risk that something may go wrong or that someone may ignore their policies, procedures or the law resulting in some very serious consequences. Experience shows that staff, or others who work on behalf of an organisation, often have worries or suspicions and could, by reporting their concerns at an early stage, help put things right or identify and stop potential wrongdoing.

**Definition**

**A Whistleblower** is generally a term used for a person who works in, or for, an organisation and raises an honest and reasonable concern about a possible fraud, crime, danger or other serious risk that could threaten colleagues, service users, customers, members of the public or the success and reputation of the organisation.

At Navenby, we want you to feel that it is safe and acceptable to tell us about your concerns so that an investigation can take place as soon as possible. We recognise that staff may be worried about reporting for a number of reasons:

- fear of reprisal or victimisation (e.g. loss of job)
- too much to lose (reputation, damage to career etc)
- feelings of disloyalty
- worries about who may be involved
- you have no proof only suspicions
- fear of repercussions if there is no evidence or you are proved wrong

All genuine concerns will be treated seriously - this policy explains how to raise a concern, the types of activity that should be reported, the protection that can be provided, confidentiality and how matters could be taken further, if necessary.

This policy should assure all staff that there is no reason to remain silent; a decision to talk may be difficult but, if you believe what you are saying is true, there is nothing to fear as you are following the Council's Code of Conduct. Navenby CE Primary School will not tolerate any harassment or victimisation and will take action to protect anyone who raises concerns that are believed to be in the best interest.

UK law protects employees from dismissal, harassment or victimisation if such treatment occurs as a result of having made a whistle-blowing disclosure considered to be **in the public interest**. In addition to the employer's liability, the individual who subjects the employee to such treatment may also be held personally liable.

This policy does not replace any of our existing employment policies and these should be used if you have a personal grievance or are unhappy with the way you are being treated. Our Whistleblowing arrangements are not intended to give you a further opportunity to pursue a grievance or complaint once you have exhausted the relevant employment procedures.

**Scope**
As an employee of a Local Authority School you can use these whistleblowing arrangements. Our policy also applies to agency staff, contractor staff and suppliers providing goods or services to, or on behalf of, the Council.

Our Whistleblowing arrangements **do not** replace the following:

- Child Protection / Safeguarding reporting
- Disciplinary Policy
- Grievance Policy

You should only consider raising concerns through our Whistleblowing arrangements if:
- you have genuine reasons why you cannot use the above policies and procedures
- you have reason to believe that these policies are failing or are not being properly applied
- there is a public interest aspect

**Protection and Confidentiality**
The Whistleblowing law is contained in the Public Interest Disclosure Act 1998 (PIDA – amended by the Enterprise and Regulatory Reform Act May 2013). Public bodies, such as the Council, are required to have a Whistleblowing policy and to ensure that employees are not victimised or dismissed for raising their concerns internally. This also applies to those who, as a last resort, feel the need to take their concerns to an outside body, such as the Local Government Ombudsman.

Navenby CE Primary we will not tolerate any harassment or victimisation (including informal pressure) and we will take action to protect employees when you raise a concern believed to be in the public interest. We will take any disciplinary or corrective action should anyone attempt to victimise the whistleblower or prevent concerns being raised.

You may feel that the only way you can raise your concerns is if we protect your identity. We will respect your confidentiality as far as we possibly can but there are times when we cannot guarantee this, for example, where a criminal offence is involved or if there are child protection or adult safeguarding issues.

If things proceed to a formal investigation evidence may be require along with other employees and witnesses; we are, in some circumstances, able to do this without disclosing the identity of the whistleblower. A statement may also be required as part of criminal proceedings or Employment Tribunal – this depends on the nature of the concern.

We will attempt to ensure the whistleblower's identity is not disclosed to third parties without a court order. If the information you provide includes personal information about another person, then that person may be entitled to access it under subject access provisions of the Data Protection Act. If releasing that information could reveal details about the whistleblower, we will always ask for your consent prior to releasing the information.

If your whistleblowing disclosure results in an internal investigation and you provide a witness statement under that process, your statement may be used for disciplinary purposes. This means your statement may be given to the subject as part of a disciplinary hearing. An employee subject to the disciplinary process can ask to see personal information held about them at any time under the Subject Access Request (SAR) provisions of the GDPR Act 2018 – this may include information within your statement. If it is possible to provide access to personal information within your statement without revealing any information about you, we will do so. If this is not possible, we will always seek your consent before releasing any information.

If your statement is not required for disciplinary purposes it will be:

- held confidentially on our case file (until the case file is destroyed after 7 years)
- released only with your consent or a Police / Court Order

If you find yourself the subject of a whistleblowing disclosure and a decision is made to investigate, the School will follow the appropriate Council employment procedure: dignity at work, grievance or disciplinary. This means you will have all the rights contained in that procedure, such as, the opportunity to respond to the allegation and representation at the investigatory interview.

**What you should report**
We encourage you to use our whistleblowing arrangements for issues such as:

- conduct which is a criminal offence or breach of law
- a breach of our Code of Conduct for staff
- sexual, physical or verbal abuse of our clients, employees or public
- dangerous procedures risking the health & safety of pupils and school staff
- unauthorised use of public funds
- suspected fraud or corruption
- damage to the environment (e.g. land, buildings, water, air, waste, energy, transport, natural habitat etc.)
- unethical or improper conduct
- services that fall seriously below approved standards or practice
- failure to follow the School's policies and procedures

NB. This is not an exhaustive list

**Anonymous or untrue allegations**
We do not encourage anonymous reporting as the concerns are more difficult to investigate and are generally less powerful. We would like you to put your name to the allegations whenever possible and remind you of the protection we can provide if we know who you are.

Anonymous whistleblowing referrals will be considered at the discretion of the officers handling your concern. This discretion will be based on the:

- seriousness of the issues raised
- credibility of the concern
- likelihood of confirming the allegation from an attributable source evidence base

It may be that our investigations do not confirm your allegation. We take all concerns seriously and can assure you that no action will be taken against you if you have raised a concern in the genuine belief that it is, or may be, true.

If we find that you have maliciously made a false allegation we will take action and you will not be eligible for protection.

**How to raise a concern**
We encourage you initially to raise your concern internally – this allows the person the opportunity to right the wrong and give an explanation for the behaviour or activity. We also advise staff to report any allegation to their line manager. We recognise that your first actions will depend upon the seriousness and sensitivity of

the issues and who you believe to be involved. We advise that you make it clear that you are raising your concerns under the School's whistleblowing arrangements – this will help senior leaders respond in line with this policy.

If you are in any doubt about what you should do, you can contact the Headteacher or the Chair of the Governing Body:

Concerns are better submitted in writing – we need the background and history of your concern, giving names, copies of any documents, dates and places (where possible). We would like you to explain why you are concerned about the situation – we do not expect you to prove the truth of an allegation but you will need to show that there are sufficient grounds for your concern.

**How we will respond**
Our response will depend on the nature of the concern raised and may be:

- advice only
- resolved by agreed action without the need for investigation
- investigated internally
- referred to the relevant safeguarding team
- referred to the Police

We may carry out initial enquiries in order to protect individuals or employees and those accused of wrongdoing. We will use the results of these enquiries to decide whether an investigation is needed and if so, what form it should take. If urgent action is required, this will be taken before we start any investigation.

We will acknowledge your whistleblowing disclosure within 5 working days. Within the next 10 working days we will write and explain how we propose to deal with the matter. The whistleblower will be:

- given an estimate of how long it will take to provide a final response
- told if initial enquiries have been made
- told if further investigation is required, and if not, why not (where appropriate)
- given details of support mechanisms
- advised of the investigating officer (where appropriate)
- advised how we will inform you of progress

The amount of contact between you and the Officer considering your whistleblowing disclosure will depend on the nature of the concerns raised. For example, if further investigation is required, the investigator may need to seek additional information from you.

If a meeting is necessary, this can be held off site if you prefer. If you are an employee, you will have a right to be accompanied – this will be a union representative or work colleague (not involved in the area where the concern exists). If you are not an employee you may wish to bring a friend with you – a neutral venue can be arranged, where required.

We will help with any difficulties you may experience as a result of raising a concern – we will, for example, provide advice if you are required to give evidence for criminal or disciplinary proceedings. Sometimes whistleblowers have counter-allegations made against them. The School has a duty to investigate any concerns that it receives and that will apply in these circumstances. However, this will not detract from the

principles, as set out in this policy, which govern how the School will respond to whistleblowers. The over-riding objective will be to establish the truth.

Records will be retained of all work carried out and actions taken to address the concerns raised by the whistleblower, including the investigator's case file, where relevant. All files will be held securely and confidentially.

At the end of our investigations we will provide feedback to the whistleblower (if known) on actions taken and limited detail on the outcome of investigations. Feedback will be subject to legal constraints but we do recognise the importance of providing you with assurances that the matter has been dealt with properly.

**Taking the matter further**
If you have genuine concerns about how we have handled your whistleblowing disclosure you can raise this with the investigating officer(s). We hope that you will be able to reach a suitable conclusion to the matter but if you remain dissatisfied you can contact the Chair of Governors

We would like to remind you that employees are not to report any School related issues to the media – to do so may be considered a breach of the School's Disciplinary Policy and Code of Conduct.

**Monitoring**
This policy will be reviewed every two years or sooner if an investigation takes place. Procedures will be looked at to see if improvements could be made. Any changes will be presented to the GB before approval.

Policy Approved: Full Governors meeting: 1st October 2026

Signed:

Chair of Governors: …… Mr J Kirby

Head teacher ……..…… Mr C Elliott