



Whistleblowing Policy

Formally adopted by the Governing Body of:	Redcastle Family School
Agreed by Governors:	
Last updated:	September 2026

Whistleblowing Policy and Procedure

Redcastle Family School

1 Purpose and status

Redcastle Family School is committed to a safe, open and transparent culture in which staff and others working with the school can raise concerns about wrongdoing, unsafe practice or failures in safeguarding without fear of retaliation. This policy explains what whistleblowing is, how to raise a concern and how the school will respond.

This policy is based on Norfolk County Council's model procedure for schools. In accordance with Department for Education guidance, the Governing Board has agreed the procedure, will minute its adoption, inform workers of the arrangements and appoint at least one named member of staff and one named governor as whistleblowing contacts.

This policy applies to employees, workers, agency staff, contractors, consultants, trainees, volunteers, governors and others providing services to or working in partnership with the school. Statutory protection applies to people who meet the legal definition of a worker. The school will nevertheless consider concerns raised by anyone within the scope of this policy and will not tolerate retaliation against a person who raises a genuine concern.

This policy should be read with the safeguarding and child protection policy, staff code of conduct, low-level concerns procedure, grievance procedure, disciplinary procedure, complaints policy, equality policies and data protection policy.

2 Legal and statutory framework

This policy reflects the law and guidance in force in England at September 2026, including:

- Part IVA of the Employment Rights Act 1996, as inserted by the Public Interest Disclosure Act 1998 and subsequently amended;
- section 21 of the Employment Rights Act 2025, which expressly added sexual harassment to the categories of wrongdoing that may form a protected disclosure from 6 April 2026;
- the Equality Act 2010;
- Keeping Children Safe in Education 2026, including the requirement for staff and volunteers to be able to raise concerns about poor or unsafe safeguarding practice;
- the UK General Data Protection Regulation and Data Protection Act 2018; and
- the current statutory list of prescribed persons and bodies under whistleblowing legislation.

3 What whistleblowing means

Whistleblowing is the disclosure of information about suspected wrongdoing or danger at work. A protected disclosure is one which meets the statutory tests, including that the worker reasonably believes the disclosure is in the public interest and tends to show that one or more of the following has happened, is happening or is likely to happen:

- a criminal offence, such as fraud or theft;
- a failure to comply with a legal obligation;
- a miscarriage of justice;

- danger to the health or safety of any person;
- damage to the environment;
- sexual harassment; or
- the deliberate concealment of information about any of these matters.

In a school, examples may include failure to follow safeguarding procedures, unsafe practice, financial fraud, misuse of public funds, serious data protection breaches, unlawful discrimination, sexual harassment, abuse of authority, poor contract management or deliberate attempts to conceal such matters. Some concerns, such as value-for-money issues, may not meet every legal test but will still be taken seriously and considered in the public interest.

A whistleblower does not need proof and should not investigate the matter personally. The concern should be based on information which the person reasonably believes to be true. It does not matter if the concern is later found to be mistaken or has an innocent explanation, provided the statutory tests are met.

4 Concerns covered by other procedures

A personal complaint about an individual's own employment will normally be considered under the grievance procedure unless it is also in the public interest. Bullying, harassment or sexual harassment may be considered under the grievance, dignity at work or disciplinary procedure as well as this policy. Using another procedure does not remove statutory whistleblowing protection where the legal conditions are met.

Complaints from parents, carers or members of the public should normally be made under the school complaints policy. Members of the public may initially contact the Headteacher, or the Chair of Governors if the Headteacher is the subject of the concern. A safeguarding concern about a child must be acted on immediately under the safeguarding and child protection policy; it must not be delayed while the correct procedure is being decided.

A member of a professional body may also have a professional duty to report a concern. If a person is unsure which procedure applies, they should raise the matter so that it can be appropriately triaged.

5 Safeguarding concerns

All staff and volunteers must raise concerns about poor or unsafe safeguarding practice or possible failures in the school's safeguarding arrangements. The following routes apply:

- A concern or allegation about a member of staff, supply worker, trainee, volunteer or contractor that may meet the harm threshold must be reported to the Headteacher without delay.
- A concern or allegation about the Headteacher must be reported to the Chair of Governors.
- Where reporting internally would create a conflict of interest or the concern is not being addressed, advice or a referral should be sought from the Norfolk Local Authority Designated Officer as appropriate.
- A concern that does not meet the harm threshold must be shared through the school's low-level concerns arrangements.
- If a child is at immediate risk of harm, contact the police on 999 and Norfolk Children's Advice and Duty Service without delay.

Where a person feels unable to raise a child-protection concern internally, or believes a genuine concern is not being addressed, they may contact the NSPCC Whistleblowing Advice Line. Contact details are in Appendix 1.

6 Appointed contacts and secure arrangements

The Governing Board will appoint a nominated employee and a nominated governor as whistleblowing contacts. Their names and contact details must be recorded in Appendix 1 and formally agreed in the minutes of a Governing Board meeting.

Any email address used for whistleblowing must be accessible only by the named contact. For example, a governor's whistleblowing inbox must not also be accessible by the clerk or school office. Access to records must be strictly limited to authorised contacts. The Headteacher must ensure that the nominated governor and member of staff can manage records independently without relying on clerks or administrators.

7 How to raise a concern

A concern may be raised verbally or in writing and should be raised as soon as possible. A worker may approach their line manager, the nominated employee or the nominated governor, provided that person is not implicated. The routes below should be used:

Situation	Report to
Usual route	Line manager, nominated employee or Headteacher
Concern involves the line manager	Nominated employee or Headteacher
Concern involves the Headteacher	Nominated whistleblowing governor or Chair of Governors
Concern involves the Chair or several governors	Vice-Chair of Governors or Norfolk County Council, as appropriate
Internal reporting is inappropriate or has not resolved the concern	Norfolk County Council, an appropriate prescribed person or body, or an independent advice service

The person raising the concern should give as much factual information as possible, including what happened, dates, places, people involved, witnesses and relevant documents. They should not investigate, confront anyone or put themselves or others at risk.

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8 Confidential and anonymous reporting

A person may ask for their identity to be kept confidential. The school will respect that request so far as possible, but complete confidentiality cannot be guaranteed. Disclosure may be required by law or may become necessary for a fair investigation. If that happens, the school will discuss the position and available support with the whistleblower before revealing their identity where lawful and practicable.

Anonymous concerns will be considered, taking account of the seriousness and credibility of the concern and the likelihood of confirming it from attributable sources. Anonymity can make it harder to verify facts, ask follow-up questions or provide feedback. The person should supply as much detail as possible and may use an anonymised email address or telephone appointment to receive questions without revealing their identity.

9 Protection and support

A worker who makes a protected disclosure has the right not to be dismissed or subjected to detriment because of it. The school will not tolerate retaliation, victimisation, bullying, harassment, threats or attempts to prevent a person from raising a concern. This includes conduct by colleagues as well as managers and may be dealt with under the disciplinary procedure.

A concern may be mistaken and still be protected where the legal tests are met. A person will not face disciplinary action merely because a genuine concern is not substantiated. Knowingly making a false or malicious allegation may be dealt with under the relevant school procedure; this does not remove protection from a disclosure that qualifies in law.

Confidentiality or non-disclosure terms cannot lawfully prevent a worker from making a protected disclosure. A person who believes they have suffered detriment should report it to a person listed in Appendix 1 and may seek independent advice promptly.

10 Manager duty to report and immediate action

Leaders and line managers must be familiar with this policy and must notify the nominated employee by the secure route within 24 hours where a worker indicates that they are whistleblowing or the content appears to meet one of the public-interest categories in section 3. If the nominated employee or Headteacher is implicated, the notification must go to the nominated governor or Chair of Governors.

This notification provides central, independent triage, protects the worker, helps select the correct procedure and supports consistent oversight and learning. It must not delay immediate action to control urgent safeguarding, health and safety or other serious risks.

11 How the school will respond

The receiving contact will treat the concern seriously, protect relevant evidence and acknowledge it as soon as possible, usually within three school days. The school will then:

- meet the whistleblower, where possible, to clarify the concern and discuss confidentiality and support;
- make initial enquiries and decide the appropriate procedure, investigator and any immediate protective action;
- ensure that the investigation is proportionate, independent, objective and evidence-based, with no investigator who has a conflict of interest;
- refer the matter where required or appropriate to Norfolk County Council, internal audit, the police, the Local Authority Designated Officer, children's social care, an external auditor, a regulator or another specialist body;
- consider whether mediation, training, policy review or another form of resolution is appropriate in addition to or instead of a formal investigation;
- keep the whistleblower informed so far as the law, confidentiality and the rights of others allow; and
- record the outcome, required actions and lessons for the school.

An initial meeting may be held away from the workplace. The whistleblower may be accompanied by a trade union or professional association representative, workplace colleague or friend. The school will aim to confirm the proposed way forward in writing within ten school days, including the anticipated timescale, enquiries made, support available and whether further investigation will take place. Complex cases may take longer.

The whistleblower will be told the outcome as far as possible. The school may be unable to disclose disciplinary action or confidential information about another person. Everyone involved must respect the confidentiality of the investigation.

12 External disclosures and independent advice

Internal reporting is encouraged where safe and appropriate because it can allow swift action. If a worker reasonably believes that the concern will not be properly handled internally, or another route is justified, they may report it to Norfolk County Council or an appropriate prescribed person or body, or seek advice from a legal adviser, trade union representative or Member of Parliament.

The chosen external body should have a statutory remit covering the concern. Wider disclosure to the media or on social media is protected only in exceptional and limited circumstances and may cause the worker to lose legal protection or breach confidentiality or data protection duties. Independent advice should be sought before any wider disclosure.

13 Training publication and awareness

The school will explain the whistleblowing arrangements during induction and promote them regularly to staff, volunteers and others working with the school. Annual training will include non-safeguarding examples such as fraud, financial irregularity, health and safety, environmental concerns and failures to comply with legal duties. Staff responsible for receiving or investigating concerns will receive suitable guidance or training.

The policy will be made readily accessible to workers and published on the school website so that it is also available to those who do business with the school.

14 Records data protection and governance monitoring

The school will keep a secure record of the concern, decisions, investigation, outcome, feedback and action taken. Access will be limited to those who need the information to manage the matter. Personal data will be processed lawfully, fairly and transparently under the school's data protection policy and retention schedule. Inappropriate access or disclosure is a data breach and must be reported without delay; it may also be a disciplinary matter.

The nominated employee and nominated governor will record the number and broad nature of disclosures and the dates and nature of feedback. The Governing Board will receive anonymised information about concerns, timeliness, outcomes, lessons and the effectiveness of the arrangements without compromising confidentiality. It may seek feedback from whistleblowers where appropriate.

This policy will be reviewed annually and sooner following a relevant change in law or statutory guidance, a serious case or identified learning. The Governing Board will minute each adoption or review.

Appendix 1 Whistleblowing contacts

Contact	Details
Headteacher or nominated employee	Name: <u>_James Julian_</u> Telephone: 01842 752239

Nominated whistleblowing governor	Name: Sian Fraser, Amy Arnold, David Oldham Telephone: 01842 752239
Norfolk County Council Report Concerns Service	01603 224433 reportconcerns@norfolk.gov.uk
Norfolk Local Authority Designated Officer	0344 800 8020 LADO@norfolk.gov.uk
Protect independent whistleblowing charity	020 3117 2520 whistle@protect-advice.org.uk www.protect-advice.org.uk
NSPCC Whistleblowing Advice Line	0800 028 0285 help@nspcc.org.uk www.nspcc.org.uk/whistleblowing
Department for Education	0370 000 2288 www.gov.uk/contact-dfe
Ofsted whistleblowing	0300 123 3155 whistleblowing@ofsted.gov.uk www.gov.uk/government/organisations/ofsted
Health and Safety Executive	0300 003 1647 www.hse.gov.uk/contact/whistleblowers.htm
Information Commissioner's Office	0303 123 1113 www.ico.org.uk
Acas	0300 123 1100 www.acas.org.uk
Police	999 in an emergency; 101 for non-emergencies
Current list of prescribed persons and bodies	www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2

Appendix 2 Key sources

- Employment Rights Act 1996 Part IVA
- Public Interest Disclosure Act 1998
- Employment Rights Act 2025 section 21
- Department for Education guidance on whistleblowing for employees and school governing boards
- Keeping Children Safe in Education 2026
- Current list of prescribed persons and bodies
- Norfolk County Council Whistleblowing Policy and Procedure for Schools P658, updated July 2026

Appendix 3 Record of changes

Date	Sections	Summary
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September 2026	All	Amalgamated Redcastle Family School policy with Norfolk County Council model P658 updated July 2026; added secure contact arrangements, manager notification, training, publication and governance monitoring requirements.
July 2026	Norfolk model	Updated by Norfolk County Council following the 2026 thematic audit and changes under the Employment Rights Act 2025.