Green Labyrinth

WHISTLE BLOWING POLICY (2026-27)

1. Purpose

Green Labyrinth is committed to conducting its business with honesty, integrity and accountability. We encourage workers to raise genuine concerns about wrongdoing, malpractice or risks within the organisation at the earliest opportunity.

This policy aims to:

- encourage individuals to report concerns;
- provide clear reporting procedures;
- ensure concerns are investigated appropriately;
- protect individuals from victimisation or detriment when making a protected disclosure in good faith;
- support compliance with the Public Interest Disclosure Act 1998 and the Employment Rights Act 1996.

2. Scope

This policy applies to:

- employees;
- agency workers;
- contractors;
- consultants;
- volunteers;
- apprentices;
- work placement students;
- governors, trustees and board members where applicable.

3. What is Whistleblowing?

Whistleblowing is the disclosure of information relating to suspected wrongdoing, risk or malpractice that an individual reasonably believes is in the public interest.

A protected disclosure may relate to concerns that:

- a criminal offence has been committed, is being committed, or is likely to be committed;
- a person has failed, is failing, or is likely to fail to comply with a legal obligation;
- a miscarriage of justice has occurred, is occurring, or is likely to occur;

- the health or safety of any individual has been, is being, or is likely to be endangered;
- the environment has been, is being, or is likely to be damaged;
- information relating to any of the above has been deliberately concealed. [gov.uk], [legislation.gov.uk]

Whistleblowing is distinct from personal employment grievances, which should normally be addressed through the Grievance Policy

4. Reporting a Concern

Employees are encouraged to raise concerns as soon as possible.

Concerns may be reported to:

1. Line Manager
2. Head of Department/Manager
3. Principal/Chief Executive
4. Chair of Governors/Trustees (where the concern involves senior leadership)

Reports may be made verbally or in writing.

Where possible, disclosures should include:

- details of the concern;
- relevant dates, times and locations;
- names of individuals involved;
- supporting evidence where available.

Individuals are not expected to prove wrongdoing before reporting it.

5. Confidentiality

The organisation will make every reasonable effort to protect the identity of a whistleblower.

Confidential information will only be disclosed where:

- required by law;
- necessary to conduct a fair investigation; or
- required to protect individuals from harm.

Anonymous concerns will be considered but may be more difficult to investigate fully.

6. Investigation Process

Upon receiving a disclosure, the organisation will:

- acknowledge receipt where appropriate;
- conduct an initial assessment;
- determine whether a formal investigation is required;
- appoint an impartial investigator where necessary;
- keep the whistleblower informed of progress where possible.

The organisation may not be able to share detailed outcomes due to confidentiality obligations, disciplinary procedures or data protection requirements.

7. Protection for Whistleblowers

No worker will suffer any detriment for making a protected disclosure in good faith.

Examples of prohibited retaliation include:

- dismissal;
- disciplinary action;
- bullying or harassment;
- victimisation;
- loss of opportunities;
- threats or intimidation;
- detrimental changes to duties or working arrangements.

Any employee found to have victimised a whistleblower may face disciplinary action up to and including dismissal. [januscompl...ance.co.uk], [gov.uk]

8. Malicious or False Allegations

Individuals raising concerns are expected to act honestly and responsibly.

Where a report is made maliciously, knowingly false, or for personal gain, disciplinary action may be taken.

A disclosure made in good faith will not result in disciplinary action simply because it is not substantiated following investigation.

9. Raising Concerns Externally

Where an individual reasonably believes that:

- the concern has not been appropriately addressed internally;
- evidence may be concealed;
- they may suffer detriment by reporting internally;

they may raise concerns with an appropriate prescribed body in accordance with whistleblowing legislation.

Examples include:

- Health and Safety Executive (HSE)
- Information Commissioner's Office (ICO)
- Ofsted
- Education and Skills Funding Agency (where applicable)
- Charity Commission (where applicable)

The current list of prescribed persons is maintained by the UK Government. [gov.uk]

10. Data Protection

Personal information obtained during a whistleblowing investigation will be processed in accordance with UK GDPR, the Data Protection Act 2018 and the organisation's Data Protection Policy.

11. Monitoring and Review

The organisation will monitor whistleblowing concerns to identify trends, risks and lessons learned.

This policy will be reviewed:

- annually;
- following significant legislative changes; or
- following any serious whistleblowing incident.

Policy Information

Item	Detail
Policy Title	Whistleblowing Policy
Policy Owner	Senior Leadership Team
Approval Body	Board of Directors/Governors
Review Frequency	Annual
Legislation	Public Interest Disclosure Act 1998, Employment Rights Act 1996, Data Protection Act 2018, UK GDPR
Next Review Date	September 2027