



Whistleblowing Policy of The Papillon Project

Purpose and scope

1. The Papillon Project (TPP) is committed to creating and maintaining a culture of openness within our organisation so that individuals feel encouraged and confident to raise any concerns relating to suspected misconduct at an early stage.
2. We also recognise the negative effect which malpractice can have on the organisation, and therefore encourage you to raise genuine concerns, or any suspicions you may have concerning misconduct.
3. This Policy is intended to cover concerns that are made in the public interest. If the matter is of an individual or personal nature it should be pursued through the Complaints Procedure. Complaints or concerns relating to bullying, discrimination, victimisation or harassment should be pursued through the Anti Bullying policy.
4. This Policy applies to full and part-time workers, interns, volunteers and Trustees. This Policy is non-contractual and may be amended by us at any time.

Protection

5. We appreciate that those reporting concerns may be apprehensive. We want to reassure you that you will suffer no detrimental treatment as a result of voicing your concerns.
6. We will not tolerate victimisation, harassment, bullying or any other detrimental treatment of any worker who has made a disclosure under this Policy. Complaints about such behaviour will be dealt with under the Anti Bullying Policy.
7. Should you feel you have been subjected to any detriment as a result of raising a concern under this Policy you should notify the Schools' Project Lead or the Trustee with lead responsibility for Safeguarding.

Disclosures under this Policy

8. You can make a disclosure under this Policy if you have genuine concerns relating to any of the following areas of malpractice, or suspected malpractice:
 - Harming of children of vulnerable adults
 - Criminal activity;

- Miscarriages of justice;
- Practices endangering health and safety;
- Practices damaging the environment;
- Failure to comply with a legal obligation;
- Bribery
- Financial malpractice, impropriety or fraud;
- Serious failure to comply with any TPP policies and procedures resulting in risks or actual harm to anyone who works, volunteers or has dealings with TPP
- Attempts to conceal any of the above.

9. The malpractice can be past, present or prospective. It may have occurred inside or outside the United Kingdom.

10. You are encouraged to report suspected wrongdoing as soon as possible. No action will be taken against you if you raise genuine concerns even if the concern you raised is not confirmed by any subsequent investigation.

Confidentiality and anonymity

11. Any disclosure you make under this Policy will be treated as far as reasonably practicable in a confidential and sensitive manner. If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to you.

12. We hope you will feel comfortable to voice any concerns openly, however, you may make a disclosure anonymously. However, concerns expressed anonymously cannot be dealt with as effectively as open disclosures as they are often more difficult to investigate.

How to make a disclosure

13. In the first instance you should bring the matter to the attention of the Schools' Project Lead, who will inform the Trustee with lead responsibility for Safeguarding. If the disclosure contains allegations about the Schools' Project Lead or the malpractice occurs at this level, you may make the disclosure directly to the Trustee with lead responsibility for Safeguarding or the Vice Chair of Trustees.

14. If your disclosure contains allegations which you do not wish to make to the Trustee with lead responsibility for Safeguarding, you can make the disclosure to the Chair of Trustees.

15. Ways to make a referral

The Board will be notified of all allegations made unless it concerns a board member.

The Lead Responsible for Safeguarding is: Matt Willer

Contact telephone number: 07746 576843

Email: safeguarding@thepapillonproject.com

The Chair of Trustees is Sarah Seery
Contact telephone number: 07923 520758
Email: chair@thepapillionproject.com

Norfolk LADO - LADO@norfolk.gov.uk

Guidance

<https://www.norfolkscb.org/people-working-with-children/how-to-raise-a-concern/local-authority-designated-officer-lado/>

NSPCC

Contact the Whistleblowing Advice Line

Call [0800 028 0285](tel:0800 028 0285)

Email help@nspcc.org.uk

Investigation

16. Once a concern has been raised, we will investigate this. If you have not made the complaint anonymously, you will be asked to attend a meeting as part of this investigation.
17. We will keep you informed as to the progress of the investigation, as far as is possible and appropriate bearing in mind, in particular, any confidentiality obligations that apply. Please note that you will not be given details of any disciplinary action taken unless we consider this appropriate.
18. If referred externally TPP will cooperate fully with any LADO investigation or request to internally investigate.

Dissatisfaction with the outcome of the internal process

19. If you are dissatisfied with the outcome of the investigation, you should raise this with the Chair of Trustees, giving the reasons for your dissatisfaction. They will respond in writing notifying you of his acceptance or rejection of the need for further investigation and the reasons for this.

Training

20. All of our staff, interns, volunteers and Trustees will receive an appropriate briefing to ensure that they are fully aware of their rights and responsibilities under this Policy. This Policy will be made available to all of the above in their induction training and will also be available on the Project website.

Breach of this Policy

21. We may invoke a Disciplinary Procedure if you are found to have subjected a whistleblower to any form of detrimental treatment. It may also be invoked if you have

intentionally misled us in respect of any matter, breached this Policy in any other way and/or if we believe that you have made a false allegation maliciously.

Policy Review

22. This policy will be reviewed at least annually and when there are any significant changes to relevant laws or national guidance.

Approved by the Board of Trustees on 3 June 2026