

Whistleblowing policy template

A whistleblowing policy is not a legal requirement for most UK employers, but whistleblowers are protected by law from day one whether or not you have one. gov.uk says: "You are not legally required to have a whistleblowing policy or to respond to whistleblowing disclosures."

A worker who reports a crime, a breach of a legal obligation, a danger to health and safety, environmental damage, a miscarriage of justice, a cover-up or, since 6 April 2026, sexual harassment, in the public interest, must not be dismissed or treated badly for it.

Compensation is uncapped.

Download the policy ? PDF • edit the [bracketed] parts

What does a whistleblowing policy say? The template

Replace each [bracketed placeholder]. Name real people in clause 4, including one outside the normal management line.

1. Purpose

[Company name] wants to hear about wrongdoing at work so that we can put it right. This policy explains what whistleblowing is, how to raise a concern, how we will respond and how you are protected. It applies to employees, workers, agency workers, trainees and contractors. It does not form part of your contract.

2. What whistleblowing is

Whistleblowing means telling us, or an appropriate outside body, about information that you reasonably believe shows one of the following has happened, is happening or is likely to happen, and that it is in the public interest to disclose: a criminal offence; a failure to comply with a legal obligation; a miscarriage of justice; danger to the health or safety of any person; sexual harassment; damage to the environment; or the deliberate concealment of any of these.

3. What it is not

A complaint about your own treatment, such as a dispute over pay, workload or how a colleague has behaved towards you, is normally a grievance and should be raised under the grievance procedure. If you are unsure which route applies, ask [role]; we will direct the concern to the right process and you will not be penalised for choosing the wrong one.

4. How to raise a concern

Tell your line manager. If that is not appropriate, because the concern involves them or you feel unable to, contact [named senior person, role, email] or [named alternative, for example a director or non-executive]. You can raise a concern in person, by email or in writing. Say what you have seen, when and where, who was involved and any evidence you have. You do not need proof, only a reasonable belief.

5. Confidentiality and anonymity

We will keep your identity confidential and share it only with those who need it to investigate, unless the law requires otherwise; we will tell you first if that arises. You may raise a concern anonymously, but it is harder for us to investigate and to give you feedback if we cannot ask you questions.

6. What we will do

We will acknowledge your concern within [five working days], decide who will look into it and tell you what to expect. An investigation will be carried out by someone not involved in the matter. We will tell you the outcome so far as we can, bearing in mind the confidentiality we owe to others. If you are not satisfied, you may ask [role] to review how the concern was handled.

7. Your protection

You will not be dismissed, disciplined or treated badly for raising a genuine concern, even if it turns out to be mistaken. Anyone who victimises a whistleblower, or tries to deter someone from raising a concern, will face disciplinary action. Knowingly making a false allegation is also a disciplinary matter. Nothing in your contract or in any settlement agreement prevents you from making a protected disclosure.

8. Raising a concern outside the company

We hope you will feel able to tell us first. You may also report to a prescribed person or body, such as a regulator, where the concern falls within its remit; the government publishes the list. You can get free, confidential advice from [Protect, the whistleblowing charity / your trade union] before deciding what to do.

9. Responsibility and review

[Role] is responsible for this policy, keeps a confidential record of concerns raised and their outcomes, and reports the number and themes to [the board / directors] each year. Last reviewed: [date].

What counts as whistleblowing in law?

A "qualifying disclosure" under section 43B of the Employment Rights Act 1996 is "any disclosure of information which, in the reasonable belief of the worker making the disclosure, is made in the public interest and tends to show one or more of" seven listed kinds of wrongdoing. Clause 2 of the template reproduces the list.

The public interest test is what separates whistleblowing from a grievance. gov.uk says: "Personal grievances are not covered by whistleblowing law, unless your particular case is in the public interest."

What changed in 2026?

- Sexual harassment is now on the list (6 April 2026). The Employment Rights Act 2025 added a new category: "that sexual harassment has occurred, is occurring or is likely to occur". A worker who reports it in the public interest has whistleblower protection as well as protection under the Equality Act.
- New government guidance for employers (6 April 2026). The 2015 guidance and code of practice has been replaced by a new gov.uk page.
- The prescribed persons list was updated (2 June 2026). Link to the live list in your policy rather than copying names into it.
- Tribunal time limits doubled (1 October 2026). gov.uk now says a claim of unfair dismissal must be raised "within 6 months of your employment ending". It was three months. Keep records of concerns and decisions for correspondingly longer.

One change is still to come. Rules to stop non-disclosure agreements being misused in cases of workplace harassment or discrimination are on the government's timeline for 2027, with no date set.

Who is protected, and against what?

- Question - Answer - Source
- Who is covered? - Employees, trainees, agency workers and members of limited liability partnerships; volunteers and the genuinely self-employed are unlikely to be - s.43K; gov.uk
- Is there a qualifying period? - No - protection runs "from the beginning of employment" and continues after someone has left - s.108(3); gov.uk
- Dismissal - Automatically unfair if the reason, or principal reason, is the disclosure - s.103A
- Other bad treatment - Unlawful detriment, including by co-workers, for which the employer is liable unless it took all reasonable steps to prevent it - s.47B
- Compensation - Uncapped - s.124(1A); gov.uk
- Gagging clauses - Void so far as they purport to stop a protected disclosure, including in settlement agreements - s.43J

The co-worker point is the practical reason to train managers. If a colleague freezes out a whistleblower, the employer answers for it unless it can show it took all reasonable steps to stop that happening.

Which employers must have whistleblowing arrangements?

The general position is that none must, and gov.uk adds: "It is a good idea to have a whistleblowing policy so that workers know how to raise concerns and managers know how to respond." Some regulated firms are required to by their regulator. The Financial Conduct Authority's handbook, for example, says that a firm to which its whistleblowing rules apply "must establish, implement and maintain appropriate and effective arrangements for the disclosure of reportable concerns by whistleblowers". If you are regulated, check your own regulator's rules rather than relying on a general template.

How do you make the policy work?

- Offer a route round the line manager. The concern is often about them.
- Separate it from grievances at the door, not after weeks in the wrong process. The grievance procedure template covers the other route.
- Investigate properly. The method is the same as any other; see how to run a workplace investigation.
- Protect the person, visibly. Check in with them after the concern is raised and again a few months later.
- Tell people it exists. Put it in the handbook and the induction.

A free template from CoDash - codash.co.uk/templates. Edit it to match how your company actually works, and take advice on anything unusual.