



Trumps Green Infant School

Whistleblowing Policy

Trumps Green Infant School is committed to safeguarding, child protection and promoting the welfare of children and young people. We expect all members of the school community including staff, parents, carers, volunteers and governors to demonstrably share this commitment.

1. Introduction & Purpose of Policy

At Trumps Green Infant School, all members of staff and those working on behalf of the School who have serious concerns about any aspect of the School's work are encouraged to come forward and voice those concerns to the Headteacher or Governing Body.

Staff not only have the right but also a duty to report any improper actions or omissions, particularly where the welfare of young people may be at risk. Where any member of staff decides to report a serious incident within the scope of this policy, whether anonymously or otherwise, this will be treated as a 'protected' disclosure. Staff members should feel reassured that they can raise concerns in accordance with this policy without fear of victimisation, subsequent discrimination or disadvantage.

This policy aims to:

- Encourage staff to feel confident in raising serious concerns and to question and act upon concerns about practice
- Encourage staff to consider 'Don't think what if I'm wrong - think what if I'm right'
- Provide avenues to raise those concerns and receive feedback on any action taken
- Ensure that staff receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied
- Reassure staff that they will be protected from possible reprisals or victimisation if they have made any disclosure in good faith

Trumps Green Infant School is mindful of its obligations under the Equality Act 2010 and this policy will be applied fairly and consistently to all staff employed at the school as well as those carrying out work for the School, for example, governors, volunteers, agency workers, contractors or consultants. The term 'member(s) of staff' is used in this document for simplicity but is intended to include this broader range of individuals covered by this policy.

This document should be read in conjunction with other relevant policies and guidance including, but not limited to Staff Behaviour/Code of Conduct, Child Protection and Safeguarding Policy, Keeping Children Safe in Education (Sept 2025) and Working Together to Safeguard Children (December 2023)

2. Legislation

There is a requirement to have clear whistle blowing procedures in place.

3. Scope of the Policy

There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. The whistle blowing policy is intended to cover serious concerns that may fall outside the scope of other procedures, in accordance with the Public Interest Disclosure Act 1998. These include (but are not limited to):

- Conduct which is an offence or a breach of law
- Failure to comply with a legal obligation
- Disclosures related to miscarriages of justice
- Health and safety risks, including risks to the public or pupils as well as other staff
- Damage to the environment
- Information relating to the above issues that has been, or is likely to be, deliberately concealed.

Examples of the above categories are likely to include:

- The unauthorised use or misuse of public funds
- Possible fraud and corruption
- Sexual, physical, or psychological abuse of pupils at the school
- Harassment & bullying of staff
- Breaches of codes of conduct
- Malpractice in examinations and assessments

Therefore, any serious concerns that a member of staff has about any aspect of the school's provision or the conduct of staff or others connected with the school can be reported under this whistle blowing policy where that member of staff has a reasonable belief in the validity of those concerns and they relate to one of the specified areas set out above.

A member of staff who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because he/she has made a disclosure.

4. Key Points About Raising Concerns

4.1 Safeguarding Against Harassment or Victimisation

It is recognised that the decision to report a concern can be a difficult one to make. The school will take a zero-tolerance approach to any act of harassment or victimisation (including informal pressures) resulting from a member of staff raising a concern in good faith, and will handle any such allegations in accordance with relevant school policies and procedures.

A member of staff making an allegation within the scope of this policy will be supported by the school when raising a concern, providing that they:

- believe the concern to be true
- is not acting maliciously or making false allegations
- is not seeking any personal gain

4.2 Unsubstantiated Allegations

If a member of staff makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary action is likely to be taken.

4.3 Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this procedure. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.

If there is evidence of criminal activity, then the Police will in all cases be informed.

4.4 Anonymous Allegations

This policy encourages staff to put their name to their allegation wherever possible.

The school will take all concerns raised seriously. Concerns expressed anonymously are much less powerful but will still be given consideration. In exercising this discretion, the school would consider the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from sources which can be attributed.

5. How to Raise a Concern

As a first step, a member of staff should normally raise concerns with the Headteacher or the School's designated safeguarding lead (DSL) where this is appropriate to the nature of the concern. If the allegations involve the Headteacher, the member of staff should raise the matter with the Chair(s) of Governors.

Concerns may be raised verbally or in writing, but the earlier the concern is expressed the easier it is to take any required action. Members of staff who wish to make a written report are encouraged to include the following information:

- The background and history of the concern, giving relevant dates and providing as much supporting evidence as possible
- The reason(s) why they are particularly concerned about the situation.

Where a concern is raised verbally, the person hearing it must ensure that a written account of it is made, to assist with any subsequent investigation. School management will take all concerns raised within the scope of this policy seriously and identify the appropriate level of investigation.

The whistleblower may invite a recognised trade union representative or a work colleague to be present during any meetings or interviews held in connection with the concerns raised.

While the school encourages members of staff to raise their concerns internally, the school also recognises that some staff may feel unable to do this and that they may therefore wish to contact an independent, external organisation.

The NSPCC's **Whistleblowing Advice Line** is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a

concern is being handled by their school. Staff can call 0800 028 0285 - line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

6. How the school will respond

In order to protect the individuals involved, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take and who should be appointed to conduct it. The overriding principle is that of the public interest. If urgent action is required, for example if the welfare of pupils may be at risk, this action will be taken before any investigation is conducted. Further to the results of this enquiry, the following steps will be considered:

- Concerns or allegations which fall within the scope of specific procedures, e.g. child protection, bullying or harassment or disciplinary, will normally be referred for investigation and consideration under those procedures.
- Where there are any concerns about financial impropriety or criminal activity, the concern will be referred to an independent body before taking any other action, which may include reporting to the police.
- Concerns indicating unlawful activity should be reported to the Education and skills funding agency (ESFA).
- Suspected incidents of malpractice relating to examinations will be reported to the appropriate awarding body at the earliest opportunity.
- In other cases, an impartial investigator may be appointed and the school will seek advice from the Local education officer/ESFA.

Communication

Within ten working days of a concern being raised, the person who is dealing with the concern will respond in writing to the employee directly. The response will:

- acknowledge receipt of the concern
- indicate how the school proposes to deal with the matter
- give an estimate of how long it will take to provide a final response
- advise whether any initial enquiries have been made
- supply information on any staff support mechanisms (e.g. EAP), and
- advise whether further investigation or action is required, and if not, why not.

Investigation

Once preliminary enquiries have established the need for an investigation, an appropriate person will be appointed to conduct the investigation. The person appointed to undertake the investigation is responsible for establishing the facts of the matter, as far as it is reasonably possible to do so, and assessing whether the concern has foundation and can be resolved internally. Other people may need to be interviewed to provide further information and/or clarification concerning the issue(s) raised.

Written records of all interviews will be kept throughout the investigation together with details of any action taken. The investigation will result in a written report and recommendations for corrective action, which will be passed to the Headteacher and/or the Chair(s) of Governors, as appropriate to the concerns under consideration, to determine whether formal action shall be taken.

The member of staff raising the concern will, subject to legal constraints, be advised in writing of the outcome of the investigation and, where appropriate, what action is being taken. This may, for example, include changes to working practices to ensure that a similar situation does not occur again.

7. Taking the Matter Further

This policy is intended to provide members of staff with an avenue to raise concerns internally. If the member of staff feels that it is right to take the matter outside the School, contact can be made with a recognised trade union, local Citizens Advice Bureau, relevant voluntary or independent organisation or legal advisor. The Public Interest Disclosure Act also sets out a number of bodies to which protected disclosures can be made, including HM Revenue & Customs, the FSA, the Health and Safety Executive and the Serious Fraud Office. Employees should be aware that going directly to the press may limit their protection under the Public Interest Disclosure Act and they could therefore be subject to disciplinary action. An employee considering such a course of action is strongly advised to seek prior advice from their trade union or an independent organisation such as Public Concern at Work (www.pcaw.co.uk)

8. Monitoring & Reporting

The Governing Body is responsible for overseeing the operation of this policy and for ensuring that appropriate records are maintained regarding concerns raised and the outcomes. It is also responsible for reporting concerns to officers at Surrey County Council and to other external bodies as appropriate to the circumstances

Policy Status	
Agreed by Staff	September 2025
Agreed by Governors	September 2025
Next Review Date	September 2026

Appendix 1

SCC model Whistleblowing Policy covering all SCC employees

Surrey Whistleblowing Policy

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Introduction

Surrey County Council is committed to the highest possible standards of honesty, openness and accountability. It seeks to conduct its affairs in a responsible manner, to ensure that all Council activities are open and effectively managed, and that the Council's integrity and principles of public interest disclosure are sustained.

In line with that commitment we encourage employees, those working on behalf of the Council and others that we deal with, who have serious concerns about any aspect of the Council's work to come forward and voice those concerns as follows:

- a) with their immediate manager and/or more senior managers. Where any member of staff decides to report a serious incident, whether anonymous or not, this will be treated as a 'protected, internal disclosure' i.e. there will be no adverse repercussions for the member of staff.
- b) through an external, independent and confidential service provided via the [Navex Global](#) helpline. Freephone: 0800 069 8180.

Purpose of the policy

Employees are often the first to realise that there may be something seriously wrong within the Council. However, staff may not express their concerns because they feel that speaking up would be disloyal to their colleagues or

to the Council. They may also fear harassment or victimisation. Each person working for Surrey County Council needs to realise that they not only have the right, but also a duty to report any improper actions or omissions. Surrey County Council also recognises and appreciates that staff who raise concerns regarding malpractice or wrongdoing are an asset to the Council, and not a threat. This policy makes it clear that they can raise concerns without fear of victimisation, subsequent discrimination or disadvantage. The whistleblowing policy is intended to encourage and enable staff to raise serious concerns within the Council.

This policy aims to:

- encourage staff to feel confident in raising serious concerns and to question and act upon concerns about practice
- provide avenues to raise those concerns and receive feedback on any action taken
- ensure that staff receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied
- reassure staff that they will be protected from possible reprisals or victimisation if they have made any disclosure in good faith.

Who is covered by the policy?

The policy applies to all Council employees whether full-time or part time, permanent or temporary; members of the Council and those carrying out work for the Council on Council premises, for example, agency workers, contractors, consultants. It also covers providers of works, services and supplies, including the Council's external contractors and those providing services under a contract with the Council in their own premises, for example, care homes. However, to facilitate the reading of this policy, the terms 'staff' or 'members of staff' have been used, with the intention to cover all individuals mentioned above.

This policy will be expected to apply to schools and arrangements for whistleblowing will be covered by individual schools' procedures to reflect their respective governance arrangements.

Scope of the policy

The whistleblowing policy is intended to cover serious concerns that fall outside the scope of other procedures, in accordance with the Public Interest Disclosure Act 1998. These include:

- Conduct which is an offence or a breach of law
- Failure to comply with a legal obligation
- Disclosures related to miscarriages of justice
- Health and safety risks, including risks to the public as well as other employees/staff
- Damage to the environment
- Information relating to the above issues that has been or is likely to be deliberately concealed.

Examples of the above categories are likely to include:

- The unauthorised use or misuse of public funds
- Possible fraud and corruption
- Sexual, physical or psychological abuse of service users

Therefore, any serious concerns that a member of staff has about any aspect of service provision or the conduct of Surrey County Council staff can be reported under the whistleblowing policy where the member of staff has a reasonable belief in those concerns and they relate to one of the specified areas set out above.

A wrongdoing disclosed under the policy should be in the public interest, this means it affects others. There are existing procedures in place to enable employees to lodge concerns relating to their own employment.

Links with other policies

In investigating financial irregularities, this policy should be read in conjunction with the Strategy against Fraud & Corruption which sets out how the financial irregularities should be investigated.

This policy does not replace the corporate complaints procedures.

As this policy is in addition to the Council's complaints procedures, and other statutory reporting procedures applying to some services, managers are responsible for making service users aware of the existence of these procedures.

Safeguarding against harassment or victimisation

The Council is committed to good practice and high standards and wants to be supportive of employees. It is recognised that the decision to report a concern can be a difficult one to make. If a member of staff has a reasonable belief that what they are saying is true, they have nothing to fear because they will be doing their duty to their employer and/or those for whom they are providing a service.

The Council will take appropriate action to protect staff when they raise a concern, by supporting the member of staff and consider action under the appropriate procedure against the person or persons responsible for the reported acts, provided the member of staff:

- Discloses the information in good faith
- Believes the concern to be true
- Does not act maliciously or make false allegations
- Does not seek any personal gain.

and provided the allegations relate to one of the categories covered by the scope of the policy.

There are national guidelines to help you as a whistleblower. See the government guidance: <https://www.gov.uk/whistleblowing>.

There is also a whistleblowing charity Protect that has a helpline on 020 3117 2520. This helpline offers independent and confidential advice to those who are unsure whether, or how, to raise a public interest concern.

Unsubstantiated allegations

If a member of staff makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary action may be taken.

Confidentiality

All concerns will be treated in confidence but at the appropriate time, the whistleblower may be asked to come forward as a witness, and this will be discussed with them.

Anonymous allegations

This policy encourages staff to put their name to their allegation whenever possible.

Where a concern is raised via the external confidential Navex Global Service, the whistleblower can choose to provide Navex Global with their name and contact details, which will not be passed to the Council without express permission from the individual. This enables Navex Global to ask for further information on the concern, if required.

The Council will take all concerns raised seriously. When carrying out an initial review of a concern, the council will take into account the following factors:

- The seriousness of the issues raised
- The credibility of the concern; and

- The likelihood of confirming the allegation from attributable sources.

How to raise concerns

There are two ways in which to raise a concern:

1. School staff should raise concerns to their immediate manager, the Headteacher, or the Chair of Governors as appropriate.

Concerns may be raised verbally or in writing. Staff who wish to make a written report are asked to provide the background and history of the concern (including relevant dates) and the reason why they are particularly concerned about the situation.

The earlier the concern is expressed, the easier it is to take action. In order to assist with the investigation, staff should provide as much detail and supporting evidence as possible. Staff are not expected to prove that an allegation is true, only to have sufficient grounds for concern.

The whistleblower may invite a recognised Trade Union representative or a work colleague to be present during any meetings or interviews in connection with the concerns raised.

2. While concerns will usually be raised internally, the Council recognises that staff may feel unable to do this, and that they may wish to contact an independent, external organisation, such as [Navex Global](#), in order to report something. Navex Global is an external and independent organisation which specialises in providing a confidential hotline service for whistleblowing and can be contacted any time, night or day, in complete confidence with any relevant concerns. The call will not be traced or monitored. Freephone: 0800 069 8180.

How the council will respond

The Council will investigate and respond to all concerns raised by staff or service users through any channels including Navex Global and the Contact Centre.

While it is not essential that the concerns be provided in writing, the person receiving the concern will, ensure that a written account of it is made. This will help with the subsequent investigation by facilitating clear record-keeping.

When a concern is raised directly with a Council officer, they should undertake the following actions:

- Take the concern seriously
- Consider the concerns fully and objectively
 - Recognise that raising a concern can be a difficult experience for employees
 - Ensure confidentiality
 - Refer to a manager of appropriate seniority, to agree the level at which the concern will be investigated and identify who will take responsibility for co-ordinating the enquiry.

Staff members who are under investigation will not be involved in the investigation process. In schools, this will include Governing Body members.

Advice and guidance on the use of the whistleblowing policy can be obtained from the HR&OD Team, via MyHelpdesk. For Schools, refer to the individual school's arrangements.

Initial enquiry

In order to protect the individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle, which the Council will have in mind, is that of the public interest. If urgent action is required, this will be taken before any investigation is conducted.

The purpose of the initial inquiry is to ascertain if the conduct or behaviour involves a Member of the Council, a senior manager or a member of staff, so that further enquiries and investigation can be progressed accordingly.

Preliminary review

A preliminary review establishes the need to carry out an investigation. Further to the results of the initial enquiry and preliminary review, and at the discretion of senior management, the following steps will then need to be considered:

- Concerns or allegations, which fall within the scope of specific procedures, e.g. child protection or discrimination issues, will normally be referred for consideration under those procedures
- Where there is any financial impropriety, the concern should be referred to Internal Audit, before taking any other action
- Inform the Council's Monitoring Officer if the concerns indicate unlawful activity.
- Ensure that matters of a criminal nature are reported to the Police, after consultation with Internal Audit
- Whether the disciplinary or other relevant management policies, procedures and processes of the Council or School need to be applied
- Appointment of an officer to carry out the investigation under these procedures.

Investigation

Depending on the nature of concerns, investigation may be carried out under the Disciplinary Policy or the Strategy against Fraud & Corruption.

Investigation Timescales

Within 14 days of a Navex Global report being received, the person who is dealing with the concern that has been raised will respond in writing:

- Acknowledging that the concern has been received
- Supplying information on staff support mechanisms, and
- Advising whether further investigations or action is required and, if not, why not.

A further update will also be provided 28 days after the report was received, advising of additional progress made and the estimated date a final response will be available.

If the whistleblower has chosen to remain anonymous and non-contactable, they will need to contact Navex Global or their original reporting route in order to receive updates.

Investigation process

The impartial investigating manager appointed to undertake the investigation will establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. Other people may need to be interviewed to provide further information and/or clarification concerning the issue(s) raised.

It is essential that written records of all interviews be kept throughout the investigation, together with written details of any action taken. The investigation will result in a written report and recommendations for corrective action which will be passed to the manager responsible for deciding whether formal action shall be taken.

Where any meeting is arranged involving an individual member of staff, which can be offsite, a recognised Trade Union representative or a work colleague may also attend. The Council/Governing Body will take steps to minimise any difficulties which may be experienced as a result of raising a concern. For instance, if a member of staff is required to give evidence in criminal or disciplinary proceedings, the Council/Governing Body will arrange for them to receive appropriate procedural and/or legal advice.

A member of staff raising directly with a senior officer a concern will be, subject to legal constraints, advised in writing of the outcome of the investigation and, where appropriate, what action is being taken.

Monitoring arrangements

The Head of HR and OD, in consultation with the Monitoring Officer has overall responsibility for the maintenance and operation of this policy. The Director of HR and OD maintains a record of concerns raised and the outcomes (but in a form which does not compromise confidentiality) and will report as necessary to the Council.

The Financial regulations state that the Director of HR and OD will ensure that whistleblowing procedures are defined, documented, widely circulated and reviewed at appropriate intervals, in consultation with the Monitoring Officer.

The practical aspects of monitoring are to assess whether:

- The policy is being used appropriately
- Concerns are being handled and investigated properly
- There are any discernible patterns of concern across the Council • The policy has been effective in identifying and deterring malpractice, and
- More needs to be done to raise awareness of the policy.