



Whistle Blowing Policy



Staff Responsible:	Headteacher
Governor Committee:	Resources
Status & Review:	Statutory Annual
Next Review Date:	Autumn 2027

Navex Global

Freephone 0800 069 8180

Navex Global is an external and independent organisation which provides a confidential hotline service for whistle blowing. Navex Global can be contacted any time, night or day, in complete confidence with any relevant concerns. The call will not be traced or monitored.

1. Introduction & Purpose of Policy

Town Farm Primary School & Nursery 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 its activities are openly and effectively managed, and that the School's integrity and the principles of public interest disclosure are sustained.

In line with that commitment, 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 their immediate manager and/or the Headteacher. 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, anonymously or otherwise, this will be treated as a 'protected, internal' disclosure i.e. there will be no adverse repercussions for the member of staff. All staff employed in schools maintained by Surrey County Council have access to an external, independent and confidential service provided by Navex Global (see above for contact details).

Employees are often the first to realise that there may be something seriously wrong within the school. However, staff may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the school. They may also fear harassment or victimisation. Each person working for the school needs to realise that they not only have the right, but also a duty to report any improper actions or omissions.

Town Farm Primary School also recognises and appreciates that staff who raise concerns regarding malpractice or wrongdoing are an asset to the school, 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 school.

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.

The Governing Body 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, Governing Body members, 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. Copies of this policy, which incorporates the key aspects of Surrey County Council's whistle blowing policy, are available to all members of staff from the policies folder on the staff drive.

2. 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:

- 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

Therefore, any serious concerns that a member of staff has about any aspect of the School's service 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 wrongdoing disclosed under the policy should be in the public interest; this means it affects others. There are existing procedures in place to enable staff to raise concerns relating to their own employment.

3. Key Principles

The school recognises and appreciates that staff who raise concerns regarding malpractice or wrongdoing are an asset to the school 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 school.

The 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 encourage staff to feel confident in raising concerns

4. How to Raise a Concern

There are two ways in which to raise a concern:

1. Staff may raise concerns with their immediate line manager, the Headteacher or a 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 of the Governing Body or, should the whistle blower feel the need to involve a person external to the school, his/her trade union/professional association or the Area Education Officer (AEO), who will refer allegations to other officers of the Council, as relevant to the nature of the concerns.

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 School 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.

5. How the School will Respond

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

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 line manager, 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 should be investigated and identify who will take responsibility for coordinating the enquiry.**

Staff members who are under investigation will not be involved in the investigation process. This will include Governing Body members.

5.1 Initial Enquiry

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.

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

5.2 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 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 Surrey County Council's Internal Audit Team 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 School need to be applied**
- **Appointment of an officer to carry out the investigation under these procedures**

5.3 Investigation Timescales

Within 14 days of a concern being raised, the person who is dealing with the concern will respond in writing either to the employee directly or to Navex Global where this was the reporting route. The response will:

- Acknowledge receipt of the concern
- Supply information on staff support mechanisms and
- Advise 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.

5.4 Investigation Records

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 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

Where any meeting is arranged involving an individual member of staff, which can be off-site, a recognised Trade Union representative or a work colleague may also attend. The 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 Governing Body will arrange for them to receive appropriate procedural and/or legal advice.

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.

6. Safeguarding Against Harassment or Victimisation

The school 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 and that staff who raise concerns regarding malpractice or wrongdoing are an asset to the school not a threat. The policy is intended to encourage and enable staff to raise serious concerns within the School. 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 the Anti-Bullying Policy.

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 he/she:

- 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
- 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.

7. 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.

8. Confidentiality

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

9. Anonymous Allegations

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

Where a concern is raised via the external confidential Navex Global service, there is provision to provide Navex Global with a name and contact details which will not be passed to the School without express permission from the individual.

The School 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.**

10. Related Policies

- Staff Code of Conduct
- Grievance Policy

11. Monitoring Arrangements

The Governing Body of the school has overall responsibility for the maintenance and 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. In reviewing this policy from time to time, the Governing Body will have regard to the Council's whistle blowing procedures in force at the time of review.

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 school
- The policy has been effective in identifying and deterring malpractice, and
- More needs to be done to raise awareness of the policy.

12. Glossary

Acronym or term	Definition
Whistleblowing	The act of reporting serious concerns about misconduct, malpractice, or unethical behaviour within an organisation.
Protected Disclosure	A report made by an employee or other associated individual about wrongdoing, which is protected under the whistleblowing policy, ensuring no adverse repercussions for the whistleblower.
Navex Global Helpline	An external, independent, and confidential service provided for reporting concerns. It can be contacted via Freephone: 0800 069 8180.
Public Interest Disclosure Act 1998	A UK law that provides protection to whistleblowers who report concerns in the public interest.
Confidentiality	The assurance that the identity of the whistleblower and the details of their report will be kept confidential to the extent possible.
Anonymous Reporting	The option for whistleblowers to report concerns without revealing their identity. While accepted, it may limit the ability to investigate fully.
Harassment or Victimisation	Retaliation or adverse treatment against a whistleblower for raising a concern. The policy protects whistleblowers from such actions

Additional Contact Details:**Email contact:**

Chair of governors@town-farm.surrey.sch.uk

Designated Safeguarding Lead

The School's DSL is: Miss L. Elliott

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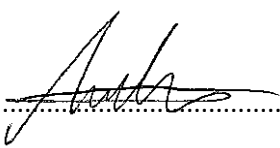
Surrey County Council's Internal Audit Team

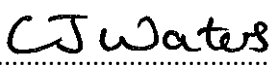
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Date Reviewed: **Summer 2026**

Date to be reviewed: **Summer 2027**

Signed:.....(Headteacher)

Signed:.....(Chair of Governors)

Date: September 2025

APPENDIX 1

Whistleblowing process flowchart Schools

