



THAMESFIELD
COLLEGE

CHANGING LIVES | CREATING FUTURES

Whistleblowing Policy

For implementation from September 2026

Prepared for Thamesfield College

Whistleblowing Policy

Changing Lives | Creating Futures

Policy statement

This policy explains how staff and others working for or on behalf of Thamesfield College can raise concerns about wrongdoing or unsafe practice in the public interest, and how those concerns will be handled fairly, confidentially and without retaliation.

Document control information

Policy name	Whistleblowing Policy
Policy number	3
School	Thamesfield College
School type	Pupil Referral Unit
Policy owner	Headteacher
Approved by	Management Committee
Approval date	[To be confirmed]
Status	For approval
Version	1
Effective from	September 2026
Review period	Annually, or sooner if guidance or local arrangements change
Next review	September 2027
Publication	School website; CPOMS Library; staff induction; annual September safeguarding update

Contents

1. Purpose and principles.....	4
2. Scope and legal framework	4
3. What can be raised under this policy	4
4. Choosing the right procedure	5
5. How to raise a concern	6
6. Confidentiality and anonymous reports.....	7
7. Support and protection.....	7
8. How Thamesfield will respond	8
9. Safeguarding concerns	9
10. External reporting and advice.....	9
11. Records, monitoring and oversight	10
12. Communication, training and review	10
Appendix 1: Quick reporting guide	11

1. Purpose and principles

Thamesfield College expects everyone working for or on behalf of the school to act with integrity and to raise concerns when something appears unsafe, unlawful or seriously wrong. Speaking up can protect pupils, staff, public money and the school. It should be treated as responsible professional conduct, not disloyalty.

The Management Committee is responsible for agreeing and establishing this procedure. The school will:

- take genuine concerns seriously and act promptly;
- not require a whistleblower to prove the concern before raising it;
- protect a person who raises a qualifying concern from dismissal, detriment or victimisation;
- keep information confidential as far as lawfully and practically possible;
- investigate fairly, including fair treatment for any person named in a concern; and
- take immediate protective action where safeguarding, safety or criminal risk requires it.

2. Scope and legal framework

2.1 Who may use this policy

This procedure is available to:

- current and former employees;
- supply and agency staff;
- trainees and apprentices;
- contractors and consultants;
- volunteers; and
- members of the Management Committee.

Statutory whistleblowing protection does not apply in exactly the same way to every person in this list.

Thamesfield will nevertheless receive and consider concerns from all of them and will not tolerate retaliation within the school's control.

Parents, carers and pupils should normally use Policy 19 - Complaints Policy or Policy 1 - Safeguarding and Child Protection Policy. Where information received through another route indicates wrongdoing in the public interest, the school may still deal with it under this policy.

2.2 Legal framework

This policy reflects Part IVA of the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and subsequent legislation. A disclosure is protected where the legal conditions are met, including that the worker reasonably believes the information tends to show a relevant wrongdoing and that raising it is in the public interest.

Protection applies from the start of employment and may continue after employment ends. A confidentiality or settlement agreement cannot lawfully prevent a protected disclosure. Anyone unsure of their legal position should seek advice from their trade union, a legal adviser or Protect.

3. What can be raised under this policy

A whistleblowing concern is information which the person reasonably believes tends to show that one or more of the following has happened, is happening or is likely to happen:

- a criminal offence;

- a failure to comply with a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any person;
- damage to the environment;
- sexual harassment; or
- the deliberate concealment of information about any of these matters.

Examples relevant to a school may include:

- a failure to safeguard pupils or a failure to act on safeguarding information;
- fraud, corruption or misuse of public funds;
- unsafe working practices;
- falsification or deliberate concealment of records;
- examination or assessment malpractice;
- serious misuse of data or information systems; or
- abusive, discriminatory or seriously improper practice affecting pupils, staff or the public.

The whistleblower is not expected to investigate the matter or prove that it is true. They should give the information they hold and explain why it causes concern. A disclosure can still be protected if the concern is ultimately mistaken or not upheld.

4. Choosing the right procedure

Whistleblowing is about wrongdoing in the public interest. It is not normally the route for a personal disagreement, dissatisfaction with an employment decision or a complaint affecting only the individual. A personal complaint may, however, also amount to whistleblowing where it meets the legal tests and raises a wider public-interest concern.

Type of concern	Use this route
A pupil may be at risk or needs safeguarding support	Record immediately on the ordinary CPOMS safeguarding system. Speak to Amanda Sutton-Hall or a deputy DSL if urgent.
An adult working for or on behalf of Thamesfield may have acted inappropriately	Use CPOMS Staff Concerns. The entry is accessible only to the Headteacher. Do not use this route for a concern about the Headteacher.
Poor or unsafe safeguarding practice, or a failure to act on concerns	Raise through this Whistleblowing Policy with the Headteacher, or externally through the NSPCC advice line if the concern cannot be raised or addressed internally.
Wrongdoing not involving an individual member of staff	Normally raise with the line manager. Go directly to the Headteacher where appropriate.
A personal employment concern affecting only you	Use Policy 9 - Grievance Policy or the other relevant employment procedure.
A complaint from a parent, carer or pupil	Use Policy 19 - Complaints Policy, unless there is an immediate safeguarding concern.

Nobody will be criticised for raising a genuine concern through the wrong internal route. The person receiving it will make sure it reaches the right person and that urgent action is not delayed.

5. How to raise a concern

5.1 General concerns

A concern not involving the conduct of an individual member of staff should normally be raised with the employee's line manager. It may be raised directly with the Headteacher where:

- the line manager may be involved;
- the matter is particularly serious;
- the matter has already been raised without an adequate response; or
- the person does not feel able to use the normal line-management route.

Permission is not required to bypass the line manager. The Headteacher can be contacted through CPOMS where appropriate, verbally, or at nelliott@thamesfieldcollege.org.

5.2 Concerns about staff or other adults

A concern about the conduct of a member of staff or another adult working for or on behalf of Thamesfield, including a supply worker, trainee, volunteer or contractor, should be recorded through CPOMS Staff Concerns. Entries in this area are accessible only to the Headteacher and are separate from pupil safeguarding records.

CPOMS Staff Concerns is confidential but not anonymous. It must not be used for a concern about the Headteacher because the Headteacher can access it.

A safeguarding concern may also be shared with Amanda Sutton-Hall, Designated Safeguarding Lead, at asuttonhall@thamesfieldcollege.org. Where it concerns the conduct of an adult, she will record it appropriately and pass it to the Headteacher immediately.

5.3 Concerns about the Headteacher or Chair

A concern about the Headteacher must be raised directly with Steve Price, Chair of the Management Committee, at s.price@tudorparkeducation.org. It should not be entered in CPOMS Staff Concerns.

A concern about the Chair should be raised directly through Surrey County Council's independent Navex Global route on 0800 069 8180. This provides an independent route outside Thamesfield.

5.4 Information to provide

Concerns may be raised verbally or in writing. A written account will be made where a concern is raised verbally. It is helpful to include:

- the background and relevant dates;
- the people, services or systems involved;
- what was seen, heard or otherwise learned;
- any documents or other evidence already available; and
- why the matter is believed to be serious or in the public interest.

The whistleblower should preserve relevant information but should not conduct their own investigation, question witnesses, access records without authority or alert a person who may be involved.

5.5 Urgent concerns

Immediate danger or suspected serious criminal activity should be reported to the emergency services where necessary. Safeguarding concerns must be acted upon immediately in accordance with Policy 1 - Safeguarding

and Child Protection Policy. Using this procedure must never delay action needed to protect a child or another person.

6. Confidentiality and anonymous reports

6.1 Confidentiality

Thamesfield will make every reasonable effort to protect the identity of a whistleblower and will share information only where it is necessary to assess, investigate or act on the concern. Absolute confidentiality cannot be guaranteed. Identity or information may need to be disclosed where required by law, a court, the LADO, police or another statutory body, or where fairness makes disclosure necessary. Where possible, this will be discussed with the whistleblower beforehand.

6.2 Anonymous reports

Anonymous concerns will be considered. The school will take account of:

- the seriousness of the issue;
- the credibility and detail of the information; and
- the likelihood that the concern can be verified from attributable evidence.

Anonymity can make it harder to obtain further information, test the evidence or provide feedback. A person wishing to remain anonymous may use Surrey / Navex Global. They may need to retain the reference provided by Navex and make contact again to receive updates.

6.3 Data protection

Information will be handled in accordance with Policy 21 - Data Protection Policy and the school's records retention arrangements. Whistleblowing records will not be placed on a pupil's safeguarding file unless the information is also directly relevant to safeguarding that pupil.

7. Support and protection

A worker who makes a protected disclosure must not be dismissed, disadvantaged or subjected to any other detriment because they spoke up. Thamesfield will not tolerate victimisation, threats, exclusion, loss of opportunity or informal pressure arising from a genuine disclosure. Concerns about retaliation should be reported immediately to the Headteacher or, where the Headteacher is involved, to the Chair.

Support available includes:

- the Schools Advisory Service (SAS) Employee Assistance Programme, using the current contact details in the staff wellbeing information;
- advice and representation from a recognised trade union or professional association;
- independent advice from Protect; and
- the right to be accompanied at a meeting by a trade union representative, professional association representative or work colleague who is not involved in the matter.

A concern that is mistaken, cannot be proven or is not upheld will not lead to disciplinary action where it was raised with a reasonable belief. Disciplinary action may be considered only where there is clear evidence that a person knowingly made a false or malicious allegation. That is different from an honest concern which turns out to be wrong.

8. How Thamesfield will respond

8.1 Initial response and timescales

Urgent safeguarding, safety or criminal concerns will be acted on immediately. In other cases, the person responsible for handling the disclosure will:

- acknowledge it within three working days;
- within ten working days, explain how the matter will be handled, who will be responsible, whether initial enquiries have begun and the likely timescale; and
- provide an update at least every 20 working days while the matter remains open.

These timescales may need to change where an external body controls the process, witnesses are unavailable or the matter is particularly complex. The whistleblower will be told the reason for any significant delay and when the next update is expected.

8.2 Initial assessment

The initial assessment is to understand the concern, identify immediate risks and decide the correct route. It is not a decision that the concern is true or false. The matter may:

- be resolved through prompt corrective action or clarification;
- be considered under another school procedure, such as safeguarding, disciplinary, grievance or complaints;
- be investigated by an impartial person within or outside the school;
- be referred to Surrey HR, Internal Audit, the Monitoring Officer, the LADO, police, an awarding body or another regulator; or
- require no further action where the information does not indicate wrongdoing and there is no reasonable line of enquiry.

Where a qualifying disclosure is dealt with under another procedure, the whistleblower retains any protection to which they are entitled for having raised it.

8.3 Responsibility for investigation

The Headteacher will normally make the initial assessment and decide how an ordinary disclosure will be investigated. The Headteacher may appoint an appropriate senior employee or seek support from Surrey HR, Internal Audit, the LADO, police or an independent investigator.

The Chair will commission or oversee the handling of a concern about the Headteacher. A concern involving the Chair will be referred directly to Surrey / Navex Global. Nobody implicated in a concern will decide how it is handled or take part in the investigation.

Financial impropriety will be referred to Surrey Internal Audit before the school takes investigative action which could compromise evidence. Matters indicating criminal activity, unlawful conduct, examination malpractice or safeguarding risk will be referred to the appropriate body as required.

8.4 Investigation process

Where an investigation is required, its scope and responsible investigator will be recorded. The investigator will gather relevant documents, speak to appropriate witnesses, keep clear records and produce findings and recommendations. The process will be proportionate to the seriousness and complexity of the concern.

The person or people named in the concern will be treated fairly and given an appropriate opportunity to respond, subject to any direction from the LADO, police or another external body. The need for fairness may limit what can be kept confidential or disclosed during the process.

8.5 Outcome and feedback

The outcome may be that the concern is substantiated, partly substantiated, not substantiated, or cannot be determined from the available evidence. Action may include changes to practice, policy or controls; training; recovery of funds; disciplinary or capability procedures; or referral to an external body.

The whistleblower will be told in writing when the matter is concluded and, where lawful, the broad outcome and any action taken to prevent recurrence. Confidentiality, data protection and employment law may prevent the school from sharing details about another person or any disciplinary action.

If the whistleblower believes the concern has not been addressed, they may escalate it to the Headteacher, then the Chair where appropriate, or use the external routes in section 10. A concern already handled by the Chair, or involving the Chair, may be taken directly to Surrey or the relevant prescribed body.

9. Safeguarding concerns

Safeguarding concerns are recorded and acted upon through the routes set out in Policy 1 - Safeguarding and Child Protection Policy and current Keeping Children Safe in Education guidance. The whistleblowing procedure provides an additional route where the concern is about poor or unsafe safeguarding practice, a failure to act, or the handling of a genuine concern.

- A concern about a pupil's welfare must be recorded immediately on the ordinary CPOMS safeguarding system and brought to the DSL or a deputy DSL where urgent.
- Any concern, however small, about the conduct of a member of staff, supply worker, trainee, volunteer or contractor must be recorded through CPOMS Staff Concerns for the Headteacher.
- A low-level concern may initially be shared with Amanda Sutton-Hall as DSL. She will inform the Headteacher promptly; the Headteacher remains the ultimate decision-maker.
- A concern or allegation which may meet the harm threshold must be referred to the Headteacher, who will decide whether an onward LADO referral is required.
- A concern about the Headteacher must be referred to the Chair. Where there is a conflict of interest in reporting to the Headteacher, the matter should be reported directly to the Surrey LADO.
- Where staff cannot raise a concern about safeguarding practice internally, or believe a genuine concern is not being addressed, they may use the NSPCC Whistleblowing Advice Line.

10. External reporting and advice

Thamesfield encourages concerns to be raised internally where this is appropriate, because the school can often act quickly. A person does not have to use an internal route first where the law permits an external disclosure or where internal reporting would be inappropriate.

Contact	When it may be relevant	Details
Surrey / Navex Global	Independent external reporting, including a concern involving the Chair	0800 069 8180 surreycc.ethicspoint.com
Protect	Independent whistleblowing advice	020 3117 2520 protect-advice.org.uk
NSPCC Whistleblowing Advice Line	Safeguarding practice or child protection failures that cannot be raised or resolved internally	0800 028 0285 help@nspcc.org.uk
Surrey LADO	Allegations about adults working with children, particularly where there is a conflict in reporting internally	0300 123 1650, option 3 LADO@surreycc.gov.uk

Contact	When it may be relevant	Details
Department for Education	A prescribed person for maintained schools and pupil referral units	0370 000 2288 gov.uk/contact-dfe
Other prescribed bodies	For example HSE for health and safety or Ofqual for examination and qualification malpractice	Use the current GOV.UK list of prescribed people and bodies

The legal conditions for protection differ according to whom a disclosure is made. A person considering a wider disclosure, including to the media, should seek advice from their union, a legal adviser or Protect. Wider public disclosure is protected only in more limited circumstances.

11. Records, monitoring and oversight

The Headteacher will maintain a secure record of concerns, decisions, investigations, outcomes and actions, in a form which protects confidentiality. CPOMS Staff Concerns records will remain accessible only to the Headteacher. The Chair will keep an appropriately secure record of any concern concerning the Headteacher.

At the second Management Committee meeting of the summer term, the Headteacher will provide an anonymised annual summary, including a nil return where no disclosures were received. It will report:

- the number and broad type of concerns;
- whether they were investigated and whether any remain open;
- whether practice, policy or controls changed; and
- any themes, training needs or wider cultural issues identified.

The Chair will ensure that any concern involving the Headteacher is reflected appropriately without compromising confidentiality. Individual cases will not be identified. The Management Committee's minutes will record the school's whistleblowing arrangements and the internal and external reporting contacts, as required by DfE guidance.

12. Communication, training and review

This policy will be:

- published on the Thamesfield College website;
- stored in the CPOMS Library and staff policy area;
- explained through staff induction, including to temporary staff and contractors as appropriate; and
- revisited during the annual September safeguarding update.

The Headteacher owns the policy and the Management Committee oversees its operation. It will be reviewed annually, or sooner if legislation, statutory guidance or Surrey arrangements change. Contact details will be checked at each review.

Key legislation and guidance

- [Employment Rights Act 1996, Part IVA](#)
- [Public Interest Disclosure Act 1998](#)
- [DfE: Whistleblowing procedure for maintained schools](#)
- [Keeping Children Safe in Education 2026](#)
- [GOV.UK: Whistleblowing for employees](#)
- [GOV.UK: Whistleblowing - list of prescribed people and bodies](#)
- [Acas: Whistleblowing at work](#)
- [Surrey Education Services: Schools HR resources](#)

Appendix 1: Quick reporting guide

If there is an immediate risk to a child or another person, act straight away. The reporting route must never delay protective action or an emergency call.

If the concern is...	Report it to...
About a pupil's safety or welfare	Ordinary CPOMS safeguarding entry → DSL/DDSL
About the conduct of a staff member, supply worker, trainee, volunteer or contractor	CPOMS Staff Concerns → Headteacher only
A safeguarding concern initially shared with Amanda Sutton-Hall	Amanda records and passes any adult-conduct concern to the Headteacher immediately
About the Headteacher	Steve Price, Chair of the Management Committee s.price@tudorparkeducation.org
About the Chair	Surrey / Navex Global 0800 069 8180
General wrongdoing or unsafe practice	Normally line manager, or directly to the Headteacher nelliott@thamesfieldcollege.org
A personal employment issue	Policy 9 - Grievance Policy
A concern you cannot raise internally	Surrey / Navex Global, Protect, the appropriate prescribed body, or NSPCC for safeguarding failures

CPOMS Staff Concerns is confidential but not anonymous. Anonymous concerns can be made through Surrey / Navex Global and will be considered in line with this policy.