Lumen Learning Trust
Learning together for a brighter future

Whistleblowing Policy

DATE APPROVED BY LUMEN LEARNING TRUST	24/06/2025 *[contact details updated October 2026]*		
REVIEW DATE Biennial	24/06/2027		
SIGNED EXECUTIVE PRINCIPAL	Mary Ellen McCarthy	**DATE**	24/06/2025
SIGNED CHAIR OF DIRECTORS	Jo Roberts	**DATE**	24/06/2025

Contact Details *[updated October 2026]* :

Designated Safeguarding Leads & Headteacher/s

Darley Dene Primary: Mrs. Zoe Devonport
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Echelford Primary: Mrs Jessica Bugembe, Miss Karen Oakley
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Ewell Grove Primary & Nursery: Miss Paula Rising
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Riverbridge Primary: Mr. Paul Grimwood
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Saxon Primary: Miss Nicola Morris
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Southfield Park Primary: Mrs. Sally Smith
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Walton Oak Primary: Mrs. Siân McCarthy
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Additional Safeguarding Leads for all Lumen schools:

Mrs. Mary Ellen McCarthy *execprincipal@lumenlearningtrust.co.uk*
Mrs. Jane Wallace *jane.wallace@lumenlearningtrust.co.uk*

Chair of Trust Directors: Mrs. Jo Roberts *jo.roberts@lumenlearningtrust.co.uk*

Governance Professional: Mrs. Lisa Cosgrave *clerktogovernors@lumenlearningtrust.co.uk*

Chairs of local Governing Bodies:

Darley Dene Primary:	Mrs. Marijke Reid	*clerktogovernors@lumenlearningtrust.co.uk*
Echelford Primary:	Mrs. Emily Fisk	
Ewell Grove Primary & Nursery:	Mrs. Rachel Tillen	
Riverbridge Primary:	Mrs. Jenny Sansom	
Saxon Primary:	Ms. Annette Stark	
Southfield Park Primary:	Mrs. Jo Roberts	
Walton Oak Primary:	Mr. James Orbell	

Local Authority Designated Officer: Telephone: 0300 470 9100 Email: *cspa@surreycc.gov.uk*

Introduction & Purpose of Policy

The Lumen Learning Trust puts the children's needs at the heart of its provision. Our whole school community is committed to enabling the children to become successful lifelong learners and happy, fulfilled adults who can make positive choices about their future.

This policy applies to all employees of Lumen Learning Trust. Other individuals performing functions in relation to the trust, such as agency workers and contractors, are encouraged to use it.

It is important to the Trust that any fraud, misconduct or wrongdoing by any employee of the Trust is reported and properly dealt with. The Trust therefore encourages all individuals to raise any concerns that they may have about the conduct of others or the way in which a Trust school or the Trist itself is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

This policy does not form part of employees' terms and conditions of employment and therefore may be subject to change at the discretion of the Trust.

1. Policy statement

Lumen Learning Trust and its constituent schools are committed to the highest standards of openness, honesty and accountability. It is very important that all employees feel they are able to talk about any concerns they may have and where they have reasonable cause to believe there has been a detrimental effect on the education provided to pupils and the working environment for staff.

This policy encourages and enables employees to raise promptly (disclose) any serious concerns they may have about the activities of employees, governors, trustees, or external organisations in relation to their dealings with the trust or its schools, without worrying about doing so.

This policy:

- Enables employees to raise any concerns they may have and to receive feedback about the outcome of any resulting investigation. It is important to note that the employee will not receive information regarding the detail of the investigation nor any actions taken;
- Allows employees to understand how and where to escalate their concerns, if following the completion of any internal processes, their concerns remain;
- protects employees from reprisals or victimisation for 'whistleblowing' made in good faith.

2. Purpose

Where an employee has a concern, it may be about something that is either already happening, has taken place, or is likely to happen in the future. A qualifying disclosure is one made in the public interest by an employee and is:

- A criminal offence or is potentially unlawful;
- A miscarriage of justice;
- Regarding the application of the Trust's or a school's policies or operating procedures;
- An act of fraud or corruption;
- Likely to cause damage or harm to a member of the public, the Trust, a trust school, employees or pupils;
- An act creating a risk to health and safety;
- An act causing damage to the environment;
- A breach of any other legal obligation;

or

- a deliberate attempt by an individual or group of people to conceal any of the above.

It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be committed - a reasonable belief is sufficient. The staff member has no responsibility for investigating the matter - it is the Trust's responsibility to ensure that an investigation takes place.

Where a concern is a made and falls into one (or more) of the above categories, the employee will be afforded protection under the Public Interest Disclosure Act 1998 (PIDA) from any repercussions on their present position or future career.

A full list of disclosures qualifying for protection can be found in the Public Interest Disclosure Act 1998.

The Trust encourages staff to raise their concerns under this procedure in the first instance. If a staff member is not sure whether or not to raise a concern, they should discuss the issue with their line manager or the Trust central HR Manager.

3. Confidentiality

The identity of employees who raise concerns will be protected as far as practicable. However, the investigation may, out of necessity, reveal the source of the information and statements made by the employee(s) who raised the issue may comprise part of any formal process, for example if a formal process / hearing is required.

Employees are encouraged to put their name to any allegations made. Concerns expressed anonymously will be considered at the discretion of the Trust, taking into account:

- The seriousness of the issues raised;
- The credibility of the concern,
- The likelihood of the allegation being substantiated,
- Whether it is considered that the allegations are untrue / false.

If an allegation is made but is not upheld following a thorough investigation, no action will be taken against the employee who raised the concern. However, employees who make malicious or vexatious allegations may be subject to disciplinary action.

4. Raising a concern

4.1. Who can raise a concern?

Any individual who currently works for or who has previously worked for the Trust or one of its schools may raise a concern. In addition, a concern, under this policy, may also be raised by an individual who works for an organisation that provides a service to the Trust or its schools such as agency workers, volunteers, governors and trustees.

However, there are certain types of people that are not covered by the PIDA. These include the genuinely self-employed, trustees, volunteers, non-executive directors etc.

4.2. How to raise a concern?

Concerns can be raised verbally or in writing as specified below. It is important that the employee provides as much detail as possible (including specific names, dates and places where known). A form to enable a thorough submission is available for use by the employee(s) raising the concern in Appendix A.

4.3 Who to raise your concern with

Employees should normally raise concerns with their line manager in the first instance. However, this will depend on the nature of the concern, the seriousness and sensitivity of the issue, and who is allegedly involved. School employees who feel unable to approach their line manager may contact their headteacher.

Trust Central team staff should contact the Trust Executive Principal.

Concern/s relating to:	Address to:
School Headteacher	Trust Executive Principal
Member of the Trust central team	Trust Executive Principal
Trust Executive Principal	Trust Chair of Directors
A school's Local Governing Body (LGB)	Trust Executive Principal
The Trust Board of Directors, be it acting or proposing to act unreasonably or has failed to discharge its duties.	Can be raised with the secretary of state for education

Trade Union members may wish to contact their union representative for assistance or advice on raising an issue.

Alternatively, where concerns are of a serious nature and criminal activity is suspected, employees have the right to raise issues directly with the police or other relevant agencies as they see fit.

Employees who raise an issue under this policy are protected by the Public Interest Disclosure Act 1998 from any repercussions on their present position or future career. The Act does not protect anyone who is knowingly acting maliciously, making false allegations or who is seeking personal gain. The trust does not tolerate any form of harassment or victimisation against an individual raising a concern.

5 Response

The action taken will depend on the nature of the concern. For example, the matter may:

- Be investigated internally;
- Be investigated by a third party (such as external HR);
- Be referred to an external auditor;
- Be referred to the police;
- Form the subject of an independent inquiry.

To protect individuals, the school and the Trust, initial enquiries will be made to determine whether an investigation is appropriate and what form it should take. Allegations which fall within the scope of specific procedures (e.g. child protection or grievance issues) will normally be dealt with under those procedures.

Some concerns may be resolved by agreed action without the need for investigation.

The person who raised the whistleblowing concern will be contacted in writing (within 10 working days of receiving the complaint) to:

- Acknowledge that the concern has been raised;
- Indicate how it is proposed to deal with the matter;
- Advise whether further investigations will take place and, if not, why not;
- Confirm, where possible, an estimate of how long it will take to provide a final response.

If necessary, further information will be sought from the employee regarding the concern. The employee will have the right to be accompanied at any meetings by a Trade Union representative or work colleague.

6 Outcome of investigation

If an investigation is warranted, the employee will be informed about the outcome of any investigation, but not the detail of the investigation or any action taken against another employee (e.g. disciplinary action).

The employee who raised the concern has no right of appeal against the outcome of the investigation, however, if the employee is not satisfied with the outcome of the investigation and wishes to take the matter outside the Trust, they may contact:

- *For safeguarding issues only*, Surrey County Council's Allegations Manager (LADO) (0300 470 9100);
- Their local councillor (for employees who live in the area of the Trust / school concerned),
- Relevant professional bodies or regulatory organisations, such as:
    - Department for Education;
    - Ofsted (whistleblowing@ofsted.gov.uk);
    - HM Revenue and Customs;
    - Health and Safety Executive.
- The police;
- The whistleblowing charity: Protect (020 3117 2520);

- A prescribed person or body not shown above.

When taking the matter outside of the Trust, the employee must ensure that they do not disclose any confidential information about the Trust, school or its employees and pupils, which is not relevant to the issue.

7 Responsibility officer

The headteacher at each school has responsibility for the operation of this policy for concerns raised regarding their school. The headteacher will ensure that details of concerns raised and their outcomes are recorded.

The Executive Principal, school Local Governing Body Chair of Governors and the Trust Chair of Directors has responsibility for the operation of this policy for concerns regarding a school headteacher. They will ensure that details of concerns raised and their outcomes are recorded.

Directors have overall responsibility for the review of this policy.

Appendix A: Lumen Learning Trust Whistleblowing Disclosure Form

Strictly Confidential

You may submit this form anonymously. However, providing your contact details can help with investigation and follow-up.

Your full name:	
Job Title/Role:	
Location:	
Contact email:	
Contact telephone:	
Date of Report:	

Details of your concern
Please give as much detail as possible, including dates, times, locations, individuals involved, and any witnesses.

What type of wrongdoing are your reporting?
Put an x for all that apply

	Safeguarding risk or failure
	Financial malpractice
	Breach of a legal obligation
	Health and safety violation
	Misconduct or unethical behaviour
	Attempts to conceal wrongdoing

Other – *please specify below*

Have you reported this concern before?

	Yes		No

If yes, please provide details *(to whom, when, and any response received):*

Supporting Evidence Do you have any supporting documents or evidence?			
	Yes - attached		No
If yes, please list or describe any documents, emails, or other materials that support your concern:			
Desired Outcome What would you like to see happen as a result of raising this concern?			
Declaration I confirm that the information provided in this form is true to the best of my knowledge and that this concern is raised in the public interest.			
Signature (if applicable)**:**			
Date:			

FOR OFFICE USE ONLY	
Received by:	
Date received:	
Action Taken/Referred to:	
Outcome/Next steps:	