

Freedom To Speak Up Policy



SLT Leads

Mike Maddick, Director of Resources
Bethan Eaton-Haskins MBE, Director of Nursing & Quality

Review Date

March 2025

Lead Author

Rebecca Strutton (Freedom to Speak Up Guardian)

Date Drafted/ Updated

August 2025/ July 2026

Critical Readers

Mike Maddick, Director of Resources
Marguerite O'Malley, Legal Services Lead
Bethan Eaton-Haskins MBE, Director of Nursing & Care

Review Date

July 2026

Recommended by

The National Guardian's Office & NHS England

Review Date

June 2022

Approved By

Board of Trustees

Ratified Date

September 2026

Published Date

September 2026

Next Review Date

September 2029

Is this policy a **mandatory read**? (tick as appropriate)

Yes ☒ No ☐ If "Yes", select the relevant audience below:

All Staff ☒

Nursing & Care ☐

Doctors ☐

Therapy ☐

Finance ☐

Estates & H&S ☐

People Team ☐

Risk & Governance ☐

Fundraising, Retail & Comms ☐

Policy Publication

The Loop ☒

Main TCT website ☐

School website ☐

1 Purpose and Objectives

1.1 Supporting children and young people with disabilities and their families requires care and skill. The reputation of The Children's Trust is built on the quality of the work we do.

1.2 The Children's Trust is committed to the highest possible standards of openness, transparency and accountability where staff feel psychologically safe to raise concerns without fear of suffering detriment for speaking up. We want to promote a culture where staff raise any concerns that may be affecting their work and well-being, or the safety and wellbeing of the children and young people we support.

1.3 The objectives of this policy are to:

- outline mandatory training
- set out our approach to Freedom to Speak Up. This policy replaces the Whistleblowing policy, incorporating the national Freedom to Speak Up policy published by NHS England.
- encourage colleagues to raise any concerns that may be affecting their work and wellbeing or the safety and wellbeing of the children and young people we support;
- promote a culture in which colleagues are supported and feel psychologically safe to raise concerns;
- ensure that colleagues who speak up do not encounter detriment (suffer any adverse treatment) for doing so.

Relevant laws and regulations include but are not limited to:

- Public Interest Disclosures Act, 1998 (update implemented April 2026)
- Human Rights Act, 1998
- UK General Data Protection Regulation and Data Protection Act, 2018
- Equality Act, 2010
- The Fundraising Code of Practice
- Bribery Act, 2010

2 Scope

2.1 This policy applies to all colleagues across The Children's Trust including employees, former employees, contractors, subcontractors, suppliers, self-employed people, bank, agency workers and volunteers ("colleagues").

2.2 We encourage former employees to raise concerns as set out in this policy within six months of the date of cessation of their employment with The Children's Trust to help facilitate follow up and resolution of concerns.

3 Definitions

Unless otherwise stated, the words or expressions contained in this document shall have the following meaning:

the Charity/ organisation/ means The Children's Trust
TCT

Reasonable belief a belief that is objectively reasonable, whether or not the belief turns out to be correct

SOP Standard Operating Procedure

Whistleblowing When a worker (not a volunteer) raises a concern about certain types of wrongdoing, also known as protected disclosures.

Complaints that count as whistleblowing:

You're protected by law if you report any of the following:

- a criminal offence, for example fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, for example does not have the right insurance
- you believe someone is covering up wrongdoing
- sexual harassment

This legal protection does not extend to volunteers.

Whistleblower You're a whistleblower if you're a worker (not a volunteer) and you report certain types of wrongdoing (as above). This will usually be something you've seen at work - though not always.

Reporting a wrongdoing is also known as making a 'whistleblowing disclosure' or 'protected disclosure'.

The wrongdoing you disclose must be in the public interest. This means it must affect others, for example the general public.

As a whistleblower you're protected by law - you should not be [treated unfairly or lose your job](#) because you 'blow the whistle'.

You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

(Whistleblowing for employees: What is a whistleblower - GOV.UK)

4 Policy Statement

4.1 When things go wrong, we need to make sure that lessons are learnt, and things are improved. If we think something might go wrong, it's important that we all feel able to speak up to stop potential harm.

4.2 Even when things are good, but could be even better, we should feel able to say something and be confident that our suggestion will be used as an opportunity for improvement.

4.3 Freedom to Speak Up is for anyone who works at The Children's Trust. This includes any healthcare professionals, non-clinical workers, senior, middle and junior managers, volunteers, students, locum, bank and agency workers, contractors and former employees.

4.4 You can speak up about anything that gets in the way of good care, or that affects your working life.

That could be something which doesn't feel right, for example a way of working or a process which isn't being followed, or behaviours of others which you feel is having an impact on the well-being of you, the people you work with, or the children and young people. Speaking up is about all of these things.

4.5 Speaking up may take many forms. It could be a quick discussion with a line manager, a suggestion for improvement, raising a matter with the Freedom to Speak Up Guardian, or bringing an issue to the attention of a regulator.

4.6 You can speak up anonymously, confidentially, or openly.

4.7 Speaking up has no limitations – it is about anything which gets in the way of doing a good job, e.g. patient care and worker wellbeing.

4.8 The terms 'whistleblowing' and 'speaking up' are often used interchangeably. They can cover raising matters about a wide range of legal and ethical issues. The term 'whistleblowing' can have negative connotations which may be a barrier to speaking up. Some people associate 'whistleblowing' with a formal process, or a matter that is escalated outside an organisation. In fact, whistleblowing is just a type of speaking up where the concern raised relates to one of the protected disclosures (see definition of Whistleblowing and Whistleblower above) and as a result the worker raising the concern benefits from additional legal protections.

4.9 We are working to make speaking up business as usual. That means being able to speak up about anything – whether that's something which doesn't feel right or an idea for improvement. You should feel confident that your voice will be listened to and action taken without fear of detriment.

4.10 When an issue is raised and it can be more appropriately dealt with under one of The Children's Trust's other policies, then that other policy will be used in place of this policy.

4.11 This policy will not usually apply to personal grievances concerning an individual's terms and conditions of employment or other aspects of the working relationship such as concerns of bullying or harassment or disciplinary matters. Such concerns will be investigated under the applicable policy or procedure.

4.12 Should it become apparent to the Investigating Officer (during the course of any investigation under this policy), that the concern relates more appropriately to another policy or procedure, then that policy or procedure will be invoked.

4.13 The Children's Trust is committed to respecting a concern raiser's request for anonymity as far as is practical and legally permissible.

5 Compliance Monitoring

The KPIs we will monitor to ensure that the policy and associated procedures are being complied with is:

KPI	Target
FTSU issues raised anonymously	Less than 12%
FTSU cases that remain unresolved after 6 months	Less than 25%

FTSU cases are only closed when an appropriate resolution has been actioned as per the National Guardian's Office advice, which states that "A case should not be closed until you and the worker are satisfied that all possible routes have been reasonably pursued, respecting the confidentiality of those involved, appropriate feedback is given to the worker that spoke up following appropriate action being taken in response to the case and further avenues explored if there is a dispute following feedback. In some circumstances, someone speaking up may decide to 'drop out' of the process – however, you will want to make sure any action taken in response to a case reaches an appropriate conclusion before it is closed".

6 Related Policies and Procedures

The following policies and procedures stated below support the effective application of this policy:

- Disciplinary Policy
- Resolution Policy
- Bullying, Intimidation & Harassment at Work Policy & Procedure
- Staff Handbook
- Reporting and Learning from Near Misses, Incidents and Patient Safety Events Policy and Procedure Including Duty of Candour
- Violence & Aggression at Work procedure
- Complaints Policy & Procedure
- Child Protection and Safeguarding Policy and associated SOPs
- Data Protection Policy
- Equity, Diversity & Inclusion Policy
- Low Level Concerns – Policy for The Children's Trust School

7 External References and Guidance

- [National Guardian's Office](#) for Freedom to Speak Up
- [Freedom to Speak Up Quality Statement](#), CQC Well Led Assessment Framework, June 2024
- [Freedom to Speak Up Policy for the NHS](#), NHS England, June 2022
- NHS England's [online resources](#) for Freedom to Speak Up
- [Keeping children safe in education 2025](#)
- [Protect](#) best practice guidelines

8 Document Change Control

Version	Status	Description (of changes)	Reviewed by	Reviewed/ Issued Date
0.1	Draft	Initial drafting to include the National FTSU policy	Mike Maddick & Marguerite O'Malley	August 2025
0.2	Draft	Comments considered and incorporated	Bethan Eaton-Haskins	July 2026
1.0	Draft	Comments considered and incorporated	Mike Maddick, Marguerite O'Malley and Quality & Patient safety Sign off meeting members	July 2026
2.0	Final	Board Meeting	Board	September 2026