

# Caldecote Community Primary School Whistleblowing Policy

Reporting illegal or improper conduct

(Disclosures under the Public Interest Disclosures Act  
1998)

or

concerns about safeguarding children & young  
people

<b>Policy Date:</b>	Jan 2026	<b>Version:</b> 1.2
<b>Policy Review Date:</b>	Jan 2027	Fran Palmer
<b>Ratified by Governing Body:</b>		
Name:		Date:

## **Values Statement**

At Caldecote, we are a learning community committed to helping our students reach beyond their grasp. We achieve this by living according to our shared values which create an environment in which all feel safe, welcome and ready to learn.

**Care:** we respect each other and our school environment.

**Challenge:** we are ready to learn; we aim high.

**Persevere:** we are resilient and we don't give up.

**Succeed:** we expect the best from everyone; we achieve our goals.

**Care, Challenge, Persevere, Succeed - we are Caldecote!**

Through our commitment to these values, we prepare our children for the brightest possible futures, equipping them with the motivation, resilience and beliefs needed to succeed.

## 1 Introduction

This policy applies to all employees and governors. Other individuals performing functions in relation to the organisation, such as agency workers and contractors, should have a copy of this also or have least read a copy. Supply teacher and volunteers come under the title 'employees' for the purpose of this policy.

It is important to Caldecote Community Primary School that any fraud, misconduct or wrongdoing by employees or governors of the school is reported and properly dealt with. The Governing Body will, therefore, respond to all individuals who raise any genuine concerns that they may have about the conduct of others in the school, **which are in the public interest**. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

**1.1** Caldecote Community Primary School expects the highest standards of conduct from all employees and governors and will treat seriously any concern raised about illegal or improper conduct.

**1.2** Any individual covered by this policy will be expected, through agreed procedures and without fear of recrimination, to bring to the attention of the Headteacher (or the Chair of Governors if the concerns relate to the Headteacher) any serious impropriety or breach of procedure.

**1.3** Employees who do not follow the steps identified in this procedure or other agreed internal procedures, and take their concerns to other outside sources (e.g. the press), may be subject to a formal disciplinary investigation.

## 2 Background

The law provides protection for employees who raise legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by the employee who has a reasonable belief that:

- A criminal offence
- A miscarriage of justice
- An act creating risk to health and safety
- An act causing damage to the environment
- Corrupt receipt of any gift or advantage, thus failing to comply with the Bribery Act 2010
- Private interests are allowed to override the interests of the school
- A breach of any legal obligation
- concealment of any of the above

is being, has been, or is likely to be, committed. 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 employee has no responsibility for investigating the matter; it is the school's responsibility to ensure that an investigation takes place.

**2.1** Where the concerns are about **safeguarding children or young people**, the school's Designated Safeguarding Lead for Child Protection should be notified (See section 7.2).

**2.2** It is a procedure in which the Headteacher or Chair of Governors will be expected to act swiftly and constructively in the investigation of any concerns in accordance with the school's disciplinary procedure.

**2.3** Concerns about a colleague's professional capability should **not** be dealt with using this procedure (but see section 7 below).

### **3 When should it be used?**

This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that his/her own contract has been, or is likely to be, broken he/she should use the school's Grievance procedures.

**Where a disclosure is merely an expression of opinion** that fails to show that a legal obligation has been or is likely to be breached, it **cannot** amount to a protected or qualifying disclosure for the purposes of the whistle blowing legislation.

**3.1** Therefore, this procedure is not designed to replace or be used as an alternative to the grievance procedure, which should be used where an employee is only aggrieved about his/her own situation. Nor should this policy apply where the employee simply disagrees with the way the school is run.

**3.2** Employees must have reasonable grounds for believing the information they have is accurate and not just idle gossip or rumour.

**3.3** An employee 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, provided it has not been made maliciously. Any employee who uses this procedure will not be penalised for doing so. The employer will not tolerate harassment and/or victimisation of any employee raising concerns.

**3.4** An employee who is not sure whether the conduct he/she is concerned about does constitute illegal or improper conduct or is unsure about how to proceed may contact the Leicester City Council HR Department – 0116 454 4310 or email: [hrpolicy@leicester.gov.uk](mailto:hrpolicy@leicester.gov.uk) or their Professional Association/Trade Union.

**3.5** Financial regulations require that any suspicion of fraud, corruption or other financial irregularity is reported to the Headteacher or Chair of Governors (but see 5), who will in turn report it to the relevant LA department.

#### **4. Principles**

**4.1** Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the employee who raised the issue.

**4.2** No employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because he/she has raised a legitimate concern.

**4.3** Victimisation of a worker for raising a qualified disclosure will be a disciplinary offence.

**4.4** If misconduct is discovered as a result of any investigation under this procedure the matter will be considered under the disciplinary procedure, in addition to any appropriate external measures.

**4.5** Maliciously making a false allegation is a disciplinary offence.

**4.6** An instruction to cover up wrongdoing is in itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority, employees should not agree to remain silent.

#### **5. Procedure**

**5.1** In the first instance, unless the employee reasonably believes his/her Headteacher to be involved in the wrongdoing, any concerns should be raised with the employee's Headteacher. If he/she believes the Headteacher to be involved, then the employee should proceed straight to the Governing Body.

**5.2** The Headteacher/Chair of Governors will arrange an investigation into the matter (either by investigating the matter himself/herself or immediately passing the issue to someone in a senior position). The investigation may involve the employee and others involved giving written statements. Any investigation will be carried out in accordance with the principles set out above. The employee's statement will be taken into account and he/she will be asked to comment on any additional evidence obtained.

Employees who want to use the procedure but feel uneasy about it may wish to consult their Professional Association/Trade Union initially and bring a colleague or Professional Association/Trade Union Representative along to any discussions, so long as the third party is not involved in the issue.

Where anonymity is requested efforts will be made to meet the request where appropriate but that might not always be possible. The earlier and more open the expression of concern the easier it will be to take appropriate action.

**5.3** The Headteacher (or the person who carried out the investigation) will then report to the Chair of Governors/Governing Body who will take the necessary action, including reporting the matter to any appropriate department or regulatory agency. If disciplinary action is required, this will be taken forward by the Headteacher/Chair of Governors/Governing body in consultation with the School's HR Advisory Team. On conclusion of any investigation, the employee will be told the outcome of the investigation and what the next steps will be. If no action is to be taken, the reason for this will be explained.

If the employee is concerned that his/her Headteacher is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigation, he/she should inform the Leicester City Council, HR Department. Employees who feel unable to follow this route, for whatever reason, have the option of contacting one of the following:

- HM Revenue and Customs
- The Financial Services Authority
- The Office of Fair Trading
- The Health and Safety Executive
- The Environment Agency
- The Director of Public Prosecutions
- The Serious Fraud Office
- The Education Funding Agency
- The Department for Education
- The National College for Teaching and Leadership

## **6 What should be done if an issue is raised with a member of staff?**

**6.1** If a member of staff, other than the Headteacher, is approached by a colleague on a matter of concern as defined in this document, he/she is advised to take the matter to the Headteacher as above point 5.

## **7 Safeguarding Children and Young People**

**7.1** All employees have a duty to report concerns about the safety and welfare of pupils/students.

**7.2** Concerns regarding a pupil about any of the following should be reported to the Designated Safeguarding Lead for Child Protection (DSL):

- physical abuse

- sexual abuse
- emotional abuse
- neglect
- issues relating to Female Genital Mutilation, Child Missing from Education, Child Sexual Exploitation & Radicalisation and other contextual safeguarding
- an intimate or improper relationship between an adult and a pupil/student (report to Headteacher)
- improper behaviour or conduct of staff towards children (report to Headteacher)

Caldecote Community Primary School's Designated Safeguarding Lead (DSL) is:

- Fran Palmer (Assistant Head for Safeguarding and SEND)

The deputy DSLs are:

- Yaroslava Briggs (Headteacher)
- Katy Barnes (Business Manager)
- Claire Kane (Family Learning and Parenting Coordinator)
- Louise Jenkins (Deputy Headteacher)
- Kelly Rogers (Assistant Headteacher)
- Leigh Smith (Attendance Officer)

**7.3** The reason for the concern may be the actions of a colleague (including a more senior colleague), a Governor, another pupil/student or someone outside the school. Whatever the reason, concerns must be reported. Failure to report a Child Protection related allegation will be, in itself, a disciplinary matter.

## **Law Relating to This Document**

Employment Rights Act 2025

Public Interest Disclosures Act 1998 (Whistleblowing)

Human Rights Act 1998 (Duty of care)

The legislation protecting individuals who makes a protected disclosure applies not only to employees, but also to any person who undertakes to do or perform personally (or otherwise) any work or service for the employer, regardless of the nature of the contractual relationship between them.

A Whistleblowing Policy should establish the procedure for an employee to follow if he/she has a genuine concern about a colleague's conduct or the organisation's practices. The Whistleblowing Policy should make clear what sort of allegations will count as a protected disclosure and should allow for the employee to raise these concerns with a nominated person and set out the steps that the employer will take in response.

A qualifying disclosure means any disclosure of information that in the reasonable belief of the worker is made in the public interest. The requirement that a whistleblower make a qualifying disclosure 'in good faith' has been removed. Therefore, while the employer can seek a declaration from the whistleblower that he or she is not knowingly making a false allegation, disciplinary action is likely to be appropriate only where there is clear evidence that the employee has misused the whistle blowing procedure. A consequence of the requirement that a disclosure be made in the public interest is that an employee will generally be precluded from being able to 'blow the whistle' about breaches of his or her employment contract.

The Employment Rights Act 2025 provides that a Settlement Agreement made between an employee and employer cannot prevent future protected disclosures.

Any confidentiality obligations in contracts of employment that would prevent an employee making a protected disclosure will be void.

For further advice, contact the NSPCC Whistleblowing Helpline 0800 028 0285.

## **8      Contacts**

### **Leicester City Council HR Department**

E mail address

Tel: 0116 454 4310

Email: [hrpolicy@leicester.gov.uk](mailto:hrpolicy@leicester.gov.uk)

### **Leicester City Council, Safeguarding Children's Unit**

Tel: 0116 454 2440

### **Duty and Advice / CASP**

0116 454 1004

### **LADO – Local Authority Designated Officer, Katherine Lockwood**

0116 454 2440

### **Head Teacher of School, Yaroslava Briggs**

Tel: 0116 2824482

### **Chair of Governors, Bill Morris**

Tel: 0116 2824482

### **DSLs in School:**

Fran Palmer

Yaroslava Briggs

Katy Barnes

Louise Jenkins

Claire Kane

Kelly Rogers

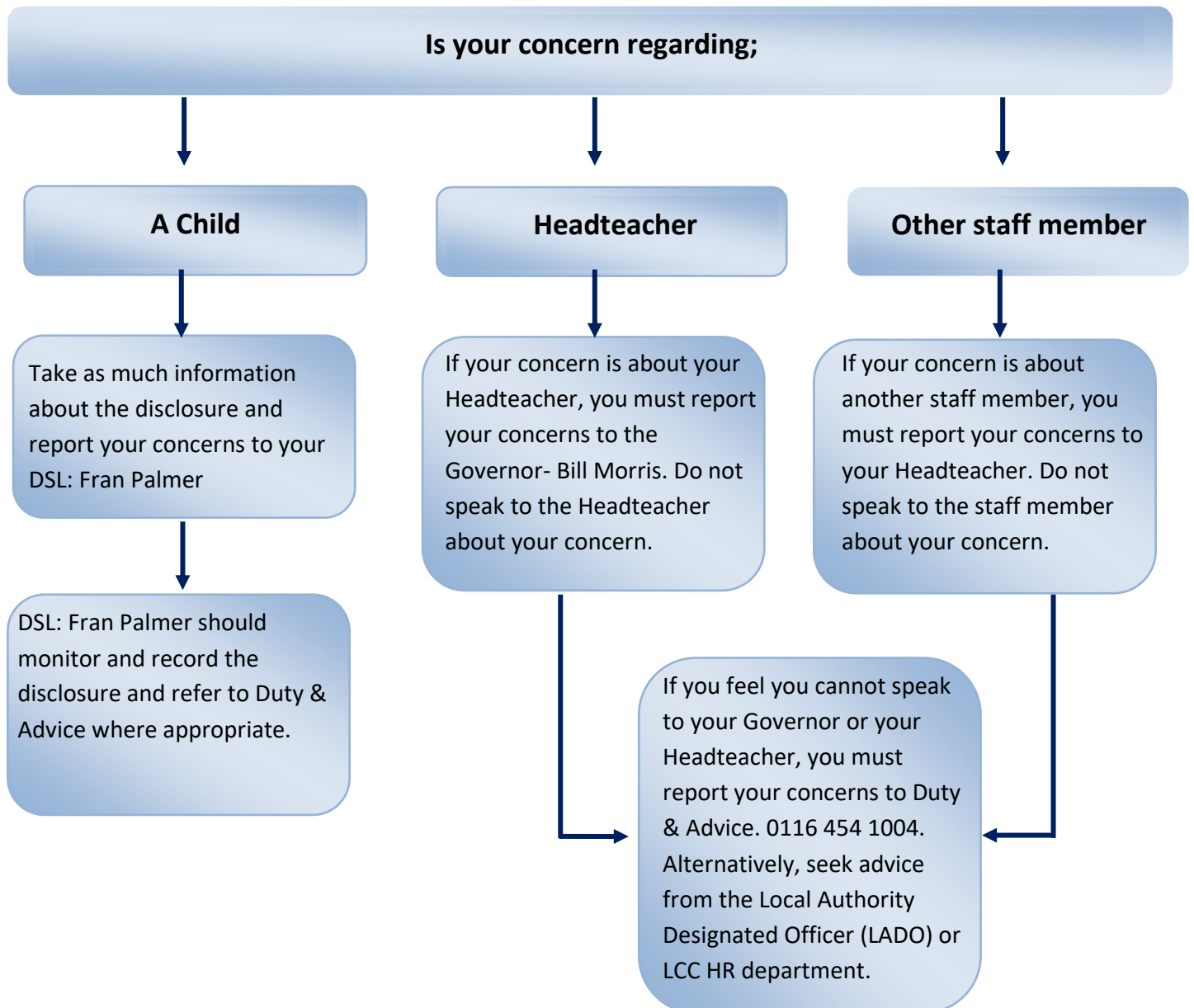
Leigh Smith

### **NSPCC Whistleblowing Helpline**

Tel. 0800 028 0285

**Public Interest Disclosure Act 1998 (whistleblowing) protects workers in private, public and voluntary organisations, if in the public interest they blow the whistle on wrongdoing.**

If you want to raise a concern in your school/college and wish to whistle blow for wrongdoing, in the first instance, use the following diagram for guidance;



**Contact Numbers (both internal and external to school):**

**Headteacher**

Yaroslava Briggs 0116 2824482

**Chair of Governors**

Bill Morris 0116 2824482

**Designated Safeguarding Lead (s)**

Fran Palmer

Yaroslava Briggs

Katy Barnes

Claire Kane

Louise Jenkins

Kelly Rogers

Leigh Smith

0116 2824482

**Safeguarding Children's Unit**

0116 454 2440

**LCC Duty & Advice /CASP (includes out of hours)**

0116 454 1004

**Safeguarding in Education**

0116 454 2440

[Safeguardingineducation@leicester.gov.uk](mailto:Safeguardingineducation@leicester.gov.uk)

**Local Authority Designated Officer (LADO)**

0116 454 2440

**Forced Marriage Unit**

Telephone: +44 (0) 20 7008 0151

Email: [fmufco.gov.uk](mailto:fmufco.gov.uk)

Email for outreach work: [fmuoutreach@fco.gov.uk](mailto:fmuoutreach@fco.gov.uk)

**Prevent Coordinator Leicester – Ailsa Coull**

[Ailsa.coull@leicester.gov.uk](mailto:Ailsa.coull@leicester.gov.uk) 0116 4546923 / 07519 069