



# Cornwall Education Learning Trust

**Whistleblowing policy**

**Exceptional Educational Experience**

# WHISTLEBLOWING POLICY

## Purpose

- Allows staff, volunteers, trustees, contractors, and agency workers to raise serious concerns without fear of victimisation.
- Promotes openness, honesty, and accountability.
- Speaking up early can prevent harm.

## What to report

- Concerns in the public interest, such as: criminal activity; breaches of policy/law; health & safety dangers; safeguarding failures; fraud/mismanagement; bribery/corruption; environmental damage; unauthorised disclosure; cover-ups.

## Key principles

- Proof is not required — a reasonable belief is enough.
- Concerns will be taken seriously, investigated, and acted on.
- Confidentiality respected as far as possible.
- Anonymous reports accepted (but harder to investigate).
- Protection under the Public Interest Disclosure Act 1998 if acting in good faith.

## How to raise a concern

- Headteacher/Service Lead first.
- If about them/unresolved Deputy Trust Lead
- If not possible → Speak to the Whistleblowing Trustee
- If about Deputy Trust Lead/Trust Leader → Chair of Trustees
- If trustees involved → Members
- If needed → escalate externally (MARU, Protect, NSPCC, DfE)

## Tips

- Make notes (dates, times, people, what was said/done).
- Provide evidence/witness statements if available.
- You may bring a trade union rep or colleague to meetings.

## Do

- Act quickly.
- Keep records.
- Raise with the right person.
- Ask what will happen next.



## Don't

- Ignore it.
- Investigate yourself.
- Use whistleblowing for personal grievances.



## Support and protection

- No dismissal, discipline, or disadvantage for genuine concerns.
- Retaliation against whistleblowers = disciplinary action.
- Support is available via the Employee Assistance Programme.

## Remember

- If you see something wrong — speak up.
- Protecting learners, colleagues, and CELT's integrity is everyone's responsibility.



### Remember:

- If in doubt speak up.
- The full policy contains detailed guidance and must be read alongside this summary.

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### **Safeguarding is everyone’s responsibility**

At Cornwall Education Learning Trust (CELT) we are committed to safeguarding and promoting the welfare of children and we expect all members, trustees, community champions, staff and volunteers to share this commitment.

This policy is part of the following suite of annually updated safeguarding policies:

1. Child protection and safeguarding
2. Supporting children and school with medical needs/ managing medicines
3. Mental health and wellbeing

4. Online safety
5. Child-on-child abuse including anti-bullying
6. Attendance
7. Code of conduct
- 8. Whistleblowing**

## Introduction

This policy applies to all employees of Cornwall Education Learning Trust (CELT), trustees, community champions, consultants, contractors, casual and agency staff and volunteers (collectively referred to as employees in this policy).

CELT's board of trustees is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we expect employees who have serious concerns about any aspect of our Trust's work to come forward and voice those concerns as soon as possible.

This procedure makes it clear that you can do so without fear of victimisation, subsequent discrimination or disadvantage for raising a legitimate concern. It is intended to encourage and enable employees to raise serious problems within our Trust, rather than overlooking a problem or "blowing the whistle" outside.

The requirement to have clear whistleblowing procedures in place is set out in the Academies Financial Handbook. This procedure does not form part of any employee's contract of employment and may be amended at any time. The board of trustees has appointed a trustee with specific responsibility for this procedure. The responsible trustee (referred to as the 'Trust's monitoring trustee' in this procedure) is available in Key Contacts.

## Aims and scope of this procedure

This policy aims to:

- encourage you to feel confident in raising concerns both low level and serious and to question and act upon concerns about practice
- provide a fair and consistent framework within which you are encouraged to speak up, in a responsible way, about any concerns you have and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied

- assure you that those concerns will be taken seriously, investigated and responded to appropriately and any request for confidentiality respected
- reassure you that you will be protected from possible victimisation if you have a reasonable belief that you have made any disclosure in good faith, even if you turn out to be mistaken

Personal staff grievances (for example bullying, harassment, discrimination) are not normally covered by this procedure and should be raised through the grievance or complaints procedures as appropriate.

This policy applies to all employees and applies equally to those designated as casual, temporary, agency, authorised volunteers or work experience, trustees, community champions and those contractors working for CELT on CELT and/or school premises, for example, agency staff, builders, drivers. It also covers suppliers and those providing services under a contract with the local authority in their own premises.

Employees and volunteers are often the first to see or suspect something that may be seriously wrong within our Trust and/or school. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to our Trust. They may also fear harassment or victimisation.

The trustees and local tier groups will not tolerate any harassment or victimisation and will take appropriate action to protect individuals when a concern is raised in good faith.

## Speak up – we are listening

Speaking up about any concern you have at work is important. In fact, it's vital because it will help us to keep improving outcomes for our pupils/students and the working environment for our staff and volunteers.

As valued employees your concerns are important, and trustees encourage problems to be brought to their attention through the procedures contained within this policy.

CELT believe that this policy and procedure will support their endeavours to foster a culture of safety and learning in which all stakeholders feel safe to raise a concern and sends a strong message to everyone within CELT that they are valued and that trustees are clear that bad organisational practice will not be tolerated and the welfare of staff, pupils and stakeholders is paramount.

You may feel worried about raising a concern, and we understand this. But please don't be put off. In accordance with our duty of candour, our senior leaders and board of trustees are committed to an open and honest culture. We will investigate what you say and you will always have access to the support you need.

## What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. The wrongdoing will typically (although not necessarily) be something an employee has witnessed at work. The law provides protection under the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998) for workers who raise legitimate concerns about specified matters or qualifying disclosures.

A qualifying disclosure is one made in the public interest by an employee who has a reasonable belief that wrongdoing or dangers at work have occurred and that fall outside the scope of other procedures.

These may relate to something which:

- is against CELT's financial regulations and policies
- is against CELT's policies and procedures
- falls below established standards of practice
- amounts to improper conduct, including something you believe may be:
  - criminal activity
  - miscarriages of justice
  - danger to health and safety
  - damage to the environment
  - failure to comply with any legal or professional obligation or regulatory requirements
  - bribery
  - financial fraud or mismanagement
  - negligence
  - breach of our internal policies and procedures (including our code of conduct)
  - conduct likely to damage our reputation
  - unauthorised disclosure of confidential information
  - other unethical behaviour
  - the deliberate concealment of any of the above matters

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

You don't need to wait for proof. We want you to raise the matter whilst it is still a concern. If you turn out to be mistaken you will not be at risk of reprisal, if it was a genuine concern and you are acting honestly.

There are some instances where there may be more appropriate procedures under which to raise a concern such as the complaints policy. If you need help deciding which would be the most appropriate procedure for your concern you can discuss this with a member of CELT's senior leadership team.

### Why is it important?

Consistently achieving high standards in the way, we work helps us achieve the right outcomes for staff, volunteers, pupils and communities ultimately ensuring we deliver our Trust values. At CELT we are committed to working with honesty and integrity. However, sometimes things do go wrong, or people behave in ways which are not appropriate or acceptable. That's why a culture of openness and accountability is so important.

We also need to have a framework in place to enable all stakeholders to report issues and concerns if they are not able to raise those concerns with their headteacher or line manager, or they believe that their concerns have not been dealt with appropriately. Our staff, community champions, trustees and some of our stakeholders are bound by professional codes of practice that require them to highlight misconduct or malpractice to a relevant professional body.

### Confidentiality and data protection

All concerns will be treated in confidence and every effort will be made to protect your identity if you so wish. At the appropriate time, however, you may need to provide a statement or act as a witness and will be expected to co-operate fully with the investigation and disclose all relevant information.

### Anonymous allegations

This procedure encourages you to put your name to your concern as anonymous allegations may often be difficult to substantiate/prove if you have not provided all the information needed.

Concerns expressed anonymously are much less powerful but will be investigated unless CELT's monitoring trustee, in consultation with the chair and vice chair of trustees, agrees there is insufficient evidence to proceed.

## Untrue Allegations

If you raise a concern in good faith, but it is not subsequently confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously, vexatiously or for personal gain, disciplinary action may be taken against you.

As part of the application of this policy, CELT will collect, process and store personal data in accordance with our data protection policy. We will comply with the requirements of data protection legislation (being the UK General Data Protection Regulation and Data Protection Act 2018) and any implementing laws, regulations and secondary legislation, as amended or updated from time to time in the collecting, holding and sharing of information in relation to our workforce. Records will be kept in accordance with our workforce privacy notice our retention policy and in line with the requirements of data protection legislation.

## How to raise a concern

When anyone feels concerned about bad practice they will need to identify the issues carefully. They must be clear about the standards against which he or she is judging practice:

- Is it illegal?
- Does it contravene professional codes of practice?
- Is it against government guidelines?
- Is it against our Trust's s guidelines?
- Is it about one individual's behaviour or is it about general working practices?
- Does it contradict what the individual has been taught?
- Has the individual witnessed the incident? If so, they should write it down.
- Did anyone else witness the incident at the same time? If so, they should write it down.

If you see an unsafe practice, risk or wrongdoing, decide whether you can tackle it yourself, there and then. A firm, polite challenge is sometimes all that is needed.

The headteacher is the member of the senior leadership team who is responsible for managing whistleblowing concerns. If you are part of the central team, then your service lead is the person responsible.

If a concern is about the headteacher or service lead, you should contact Director of Primary/Secondary or Deputy Trust Lead.

If you do not feel your concerns have been heard or unable to contact the headteacher, contact Director of Inclusion.

If you are not able to contact a member of the Executive Leadership Team please contact the nominated whistleblowing trustee.

If a concern is about a Deputy Trust Lead or Trust Leader, you should contact the chair of trustees.

If it is believed that trustees of CELT are involved, you should approach the members.

If the concern is being raised by outside suppliers or contractors, you should address their comments through their point of contact to the headteacher, service lead and/or Director of Inclusion.

Once you have decided that you wish to share the concern the following action should be considered:

- Concerns may be raised verbally or in writing. If you wish to make a written report should give the background and history of the concern and the reason why you are particularly concerned about the situation. The earlier concerns are expressed, the easier it is to take action
- You may ask for a private confidential meeting with the person to whom they wish to make the complaint.
- You should take to the meeting, if possible, any dated and signed written supporting statements from anyone who can confirm the allegations.
- When making the complaint verbally, you should write down any relevant information and date it. Keep copies of all correspondence and relevant information.
- You should ask the person to whom they are making the complaint what the next steps will be and if anything, more is expected of them.
- You should ask to be informed of the outcome of the investigation into the complaint.

- Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for their concern.
- You may wish to consider discussing their concern with a colleague/contact within the organisation first and they may find it easier to raise the matter if there are two people who have had the same experience or concerns.
- You may ask their trade union or professional association representative to advise you or be present during any meetings or interviews in connection with the concerns they have raised. Volunteers may ask a colleague volunteer or associate from within the organisation to advise them or be present during any meetings or interviews in connection with the concerns they have raised.

Individuals will not be victimised, disciplined or disadvantaged in any way for raising genuine concerns. Everyone has legal protection under the Public Interest Disclosure Act 1998. This act protects individuals from victimisation by their employer because of raising genuine concerns both inside or outside their organisation. However, this does not apply where allegations are found to be malicious or deliberately false. Such behaviour will be dealt with under the disciplinary procedure or appropriate volunteer procedures.

Employees also have the right to raise matters of concern under the grievance procedure.

Where employees fail to report their concerns, they may themselves become implicated and consequently the trustees may treat failure by an employee to report such matters as a serious matter which could lead to disciplinary action.

You may wish to obtain assistance in putting forward your concern, from a Trade Union representative or a workplace colleague. You may choose to be represented by a Trade Union representative or workplace colleague at any meetings which are required.

### How the CELT Board will respond

To protect individuals and trustees, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (for

example child protection issues) will normally be referred for consideration under those procedures.

The person with whom you have raised your concern will inform the relevant trustees of the facts. The trustees (or their representative) will write to you, within ten working days, with the following:

- acknowledgement that the concern has been received
- an indication of how the concern will be dealt with
- an estimate of how long it will take to provide a full response
- whether any initial enquiries have been made
- whether further investigations will take place, and if not, why not

In investigating a whistle blowing complaint trustees or their agreed representative will ensure:

- no conflict of interest between the investigator and the issue being investigated
- clear terms of reference and scope for the investigation
- clarification of what evidence needs to be gathered and how it will be gathered
- that all investigative work is clearly documented

In some cases, an investigator may be appointed or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. We may in some circumstances, appoint an external person or body to investigate the concern. The investigator(s) will collate findings on the matter and may make recommendations for change to enable us to minimise the risk of future wrongdoing. This will be sent to the headteacher and/or trustees for actioning.

The trustees (or representative) will inform you in writing of the outcome of any investigation, or any action taken, subject to the constraints of confidentiality and the law.

You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

## The responsible officer

CELT's monitoring trustee has overall responsibility for the maintenance and operation of this policy within our Trust. On behalf of our Trust's monitoring trustee, CELT will maintain a record of concerns raised and the outcomes which will be reported to the Audit and risk committee and as necessary to the Board. The recording and reporting procedure will be in a form which ensures your confidentiality.

## How the matter can be taken further

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in section 7 - How to raise a concern. Contact details are set out at the end of this policy.

This procedure is intended to provide you with a route within the Trust to raise concerns, but if you do not feel your concern has been addressed adequately you may raise it with an independent body such as one of the following:

- Regional Schools Commissioner
- your trade union
- your local Citizens Advice Bureau
- a relevant professional body or regulatory organisation
- a relevant voluntary organisation
- the police
- the local government ombudsman

You have a duty to the school and our Trust not to disclose confidential information. This does not prevent you from raising concerns with an independent body referred to above or from seeking advice from Protect, formerly Public Concern at Work, a registered charity which advises on serious malpractice within the workplace in accordance with the provisions of the Public Interest Disclosure Act 1998. Further information is available at [www.protect-advice.org.uk](http://www.protect-advice.org.uk) or by telephoning their advice line on 0203 117 2520.

## How we will learn from concerns raised

The focus of our learning from an investigation will be on improving our Trust in line with our values. Where an investigation identifies areas of weakness or improvements that can be made, lessons will be shared across the whole Trust and wider if appropriate.

Our Board of trustees will be given high level information about all concerns raised by our staff, volunteers and community using this Policy and how we are responding to make the necessary changes to put things right or make improvements.

The Board of trustees supports and encourages all stakeholders to speak up and monitors concerns raised on a termly basis. The audit and Risk Committee receives reports of the outcome of individual cases and management oversight of the process (see appendix 1).

## Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform one of the contact people in section 13 immediately.

If the matter is not remedied, you should raise it formally using our grievance procedure. Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action. In some cases, the whistleblower could have a right to sue an individual personally for compensation in an employment tribunal.

The employee assistant programme (EAP) is available to whistleblowers who raise concerns under this policy. Their contact details are set out at the end of this policy.

## Review of policy

This policy is reviewed annually by CELT. All staff can review the effectiveness and make recommendations to the policy on an annual basis. We monitor the application and outcomes of this policy to ensure it is working effectively.

## Contacts

Trust leader	Dan Morrow - <a href="mailto:dmorrow@celtrust.org">dmorrow@celtrust.org</a>
Deputy trust lead	Richard Baker – <a href="mailto:rbaker@celtrust.org">rbaker@celtrust.org</a>
Chair of CELT Board	Sally Foard - <a href="mailto:sfoard@gov.celtrust.org">sfoard@gov.celtrust.org</a>
Trust's monitoring trustee	Sally Foard - <a href="mailto:sfoard@gov.celtrust.org">sfoard@gov.celtrust.org</a>
Human resources	<a href="mailto:hr@celtrust.org">hr@celtrust.org</a>
CELT's external auditors	Francis Clark LLP, Lowin House, Tregolls Road, Truro TR1 2NA Telephone: 01872 276477 Fax: 01872 222783
MARU – Cornwall Councils Multi-Agency Referral Unit	(if you are worried about a child or young person) 0300 123 1116
Protect, formerly Public Concern at Work (Independent whistleblowing charity)	Helpline: 0203 117 2520 E-mail: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a> Website: <a href="http://www.protect-advice.org.uk">www.protect-advice.org.uk</a>
NSPCC Whistleblowing Advice Line (for professionals with concerns about how child protection issues are being handled in their organisation)	Telephone: 0800 028 0285 E-mail: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Department for Education	Telephone: 0370 000 2288 Website: <a href="http://www.gov.uk/government/organisations/department-for-education">www.gov.uk/government/organisations/department-for-education</a>
Ofqual	Telephone: 0300 303 3344 Website: <a href="http://www.gov.uk/government/organisations/ofqual">www.gov.uk/government/organisations/ofqual</a>

## Appendix one: Monitoring of whistleblowing concerns

CELT will collect the following information about any whistleblowing complaint which will be shared with the Audit and Risk Committee of the Board of trustees:

- date the concern was raised
- the nature of the concern
- who the concern was initially raised with
- whether confidentiality was requested
- the approach adopted
- the outcome (concern founded / unfounded)
- whether feedback was given to the worker
- whether the worker was satisfied with the outcome and if not why not
- date the case was closed

Trends or business risks which may need to be addressed will be discussed by the Audit and Risk committee of the Board of trustees and any agreed mitigations actioned.

## Appendix two: Process for raising and escalating a concern using the whistleblowing policy

### Step One

If you have a concern about a risk, malpractice or wrongdoing at work, we hope you will feel able to raise it first with your headteacher. This may be done verbally or in writing.

### Step Two

If you feel unable to raise the matter with your headteacher, for whatever reason, please raise the matter with the Deputy Trust Lead. They will:

- treat your concern confidentially unless otherwise agreed
- ensure you receive timely support to progress your concern
- escalate to the Board of Trustees any indications that you are being subjected to detriment for raising your concern
- remind those responsible of the need to give you timely feedback on how your concern is being dealt with
- ensure you have access to personal support because raising your concern may be stressful. If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made

### Step Three

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it as outlined above, please contact Ashley Mann.

### Step Four

You can raise concerns formally with external bodies.

Summary - for staff wishing to raise a whistleblowing concern:

#### DO

- make an immediate note of concerns
- keep calm
- note all relevant details, such as what was said, the date, time and names of the people involved
- tell an appropriate person about your concerns (see section 6 above)
- remember you are a witness not a complainant

- deal with the matter quickly; any delay may allow the problem to continue or worsen

#### DON'T

- do nothing
- forget there may be an innocent or good explanation
- use the whistleblowing policy to pursue a personal grievance
- be afraid of raising concerns
- try to investigate the matter yourself

#### The role of the headteacher

It is a headteacher's responsibility to ensure that employees are made aware of the whistleblowing policy and they are given an opportunity to raise any questions about its operation. The policy also applies to agency staff, others working for CELT and volunteers who must also be made aware that the policy is also available to them.

All concerns must be looked into (headteachers, leaders and managers will be able to call on the assistance of Deputy Trust Lead to help with this) and the employee(s) told the outcome. Concerns must be acknowledged within 10 working days and stakeholders must be given an indication of how long they can expect to wait before receiving a response.

#### What you should do

- make sure you are aware of the procedure to follow
- all concerns should be recorded, including the date the concern was raised, dates of interviews with relevant personnel, who was present at each interview and the action agreed (this information must be passed to the governance officer to ensure all whistleblowing concerns are formally noted and recorded)
- records should be kept safely and securely; they may be required at a later date
- should any criminal activity or fraud be suspected, the Deputy Trust Lead must be informed in order to decide at what stage the police should be involved, and the trustee responsible for whistleblowing should also be alerted
- action must be taken to protect the employee raising the concern from acts of recrimination

#### DO

- be responsive to staff concerns
- note all details
- evaluate the allegation objectively
- deal with the matter promptly

#### DON'T

- ridicule suspicions raised by staff
- approach or accuse any individuals directly
- convey your suspicions to anyone other than those with the proper authority
- try to investigate the matter yourself.

### Appendix: History of Changes

Version	Date	Page	Change	Origin of change
1.0	20.11.22		Original draft	
1.1	16.08.24		Updates to policy including: data protection, how investigations are carried out, protection and support for whistleblowers and review of policy	
1.2	14/08/2025		Review, change of personnel for named Trustee.	