Cornwall Education Learning Trust

Whistleblowing Policy

Safeguarding Policy Suite

Cornwall Education Learning Trust Policies
Cornwall Education Learning Trust (CELT), Atlantic Centre, Trenance Leisure Park, Newquay, Cornwall TR7 2LZ

Our Mission

At Cornwall Education Learning Trust (CELT), our mission is clear: to provide every learner with an **exceptional educational experience.** One that enables them to thrive, achieve and succeed in life. We believe in a **100%** mindset, that every learner, in every classroom, in every school, deserves the very best we can offer. For us, 100% means no compromise: no learner left behind, no community overlooked, and no opportunity wasted.

Our strategic goals reflect this ambition. We are committed to empowering and growing our people, building an ambitious all-through entitlement, forging exceptional relationships with our communities, transforming provision through meaningful partnerships, and leading an ethical, effective and innovative organisation. These are not just aspirations; they are promises that shape the way we work and the culture we are building together.



Our Values

Our values are at the heart of everything we do. We believe in the power of **Collaboration**, building strong relationships and working together as one team to achieve our collective goals. We are committed to **Empowerment**, creating a culture where initiative, innovation and trust flourish, and where every individual feels valued, respected and motivated.

As a Trust, we are grounded in promoting **Leadership**, sharing a moral and ethical purpose to improve the lives of others and make a lasting difference for our learners and communities. And we embrace **Transformation**, approaching change positively so that we can all become our best selves and do our best work.

These values guide every decision we make and every action we take. They are the foundation of our Trust and the reason we can offer such exceptional opportunities for our learners and staff. If you choose to join CELT, you will be part of a values-driven organisation where people are supported to grow, contribute, and thrive.

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1. Policy Overview

1.1 Introduction

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

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 Academy Trust 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.

1.2 Policy Approval and Review

Policy Version Number:	4
Approved By:	Trustees
Approved On (Date):	10th September 2026
Review Period:	Annually by end of September 2027

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.

1.3 Policy Version History

Policy Version	Date Issued	Summary of Changes
1	20.11.2022	Original draft
2	16.08.2024	Updates to policy including: data protection, how investigations are carried out, protection and support for whistleblowers and review of policy
3	14.08.2025	Review, change of personnel for named Trustee.
4	06.08.2026	Changes in blue.

2. Policy Definitions and Framework

2.1 Aims

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.

If a complaint relates to your own personal circumstances but you also have wider concerns regarding one of the areas set out in the qualifying disclosures above (for example, a breach of our internal policies), you should discuss with a member of CELT's senior leadership team which route is the most 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.

2.2 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.

3. 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
    - a disclosure that sexual harassment has occurred, is occurring, or is likely to occur
    - 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.

If your concern is in relation to safeguarding and the welfare of pupils or students, you should consider whether the matter is better raised under the relevant school's child protection policy and in accordance with the arrangements for reporting such concerns, i.e. via the designated safeguarding lead, although the principles set out in this policy may still apply.

3.1 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.

3.2 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.

3.3 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.

3.4 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.

4. Raising a whistleblowing 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 Education or Director of Inclusion.

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 the Deputy Trust Lead contact the Trust Leader.

If a concern is about the 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.
- A written summary of your concern will be taken and a copy provided to you following the meeting. You will also be given an indication of how we propose to deal with the matter.
- 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. Any companion must respect the confidentiality of the disclosure and any subsequent investigation.

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 re required.

5. Investigation and Outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases, we may appoint an investigator 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, service lead and/or trustees for actioning.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, an outcome, or any disciplinary action taken as a result. 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.

5.1 If you are not satisfied

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 the whistleblowing trustee. 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. The law recognises that in some circumstances, it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone externally. 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
- Protect holds a list of prescribed regulators for reporting certain types of concern. Alternatively, the full list of prescribed persons and bodies is available on GOV.UK at https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies.

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 or by telephoning their advice line on 0203 117 2520.

5.2 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.

5.3 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).

6. Contacts

Trust leader	Dan Morrow - dmorrow@celtrust.org
Deputy trust lead	Richard Baker – rbaker@celtrust.org
Chair of CELT Board	Stuart Radnedge
Whistleblowing Trustee	Jon Newnes
Human resources	hr@celtrust.org
CELT's external auditors	Francis Clark LLP, Lowin House, Tregolls Road, Truro TR1 2NA Telephone: 01872 276477 Fax: 01872 222783
MASSH – Cornwall Councils Multi Agency Support and Safeguarding Hub	(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: whistle@pcaw.co.uk Website: www.protect-advice.org.uk
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: help@nspcc.org.uk
Department for Education	Telephone: 0370 000 2288 Website: www.gov.uk/government/organisations/department-for-education
Ofqual	Telephone: 0300 303 3344 Website: www.gov.uk/government/organisations/ofqual
Equality & Human Rights Commission (EHRC)/ / Equality Advisory Support Service (EASS)	Telephone: 0808 800 0082 Website: www.equalityadvisoryservice.com

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
- 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.