

THE MOUNT SCHOOL

WHISTLEBLOWING POLICY

2026–2027

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Policy writer	Euan Burton-Smith
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This policy retains the openness, confidentiality and anti-reprisal principles of the 2025–2026 Mount policy while strengthening safeguarding routes.

1. About this policy

The School is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards in accordance with the Staff Disciplinary and Conduct Policy. All organisations face the risk of wrongdoing, unsafe practice or failures being overlooked. A culture of openness and accountability is essential so that concerns are raised and addressed.

This policy is intended to make it straightforward and safe for workers to speak up. Safeguarding concerns about poor or unsafe practice, or potential failures in the School's safeguarding arrangements, must be capable of being raised without fear of reprisal.

2. Aims

- not tolerate malpractice, unlawful conduct or unsafe practice;
- encourage concerns to be raised as soon as possible and taken seriously;
- provide clear routes outside normal line management where appropriate;
- protect confidentiality so far as reasonably possible and consistent with a fair/effective response;
- support workers who raise genuine concerns, including concerns that ultimately prove mistaken;
- prohibit retaliation, victimisation or detrimental treatment for protected whistleblowing;
- ensure safeguarding concerns can be escalated internally or externally without unnecessary delay; and
- distinguish genuine whistleblowing from knowingly false or malicious allegations.

3. Scope

This policy is primarily for employees and workers. The School will also provide appropriate routes for agency staff, volunteers, contractors, students and others working within the School to raise safeguarding or public-interest concerns.

Whistleblowing usually concerns wrongdoing that affects others or the public interest. A concern solely about an individual's own employment circumstances will normally be dealt with under the Grievance Procedure. However, a concern is not excluded from whistleblowing merely because the person raising it is also personally affected.

If a person is unsure which procedure applies, they may seek advice from the Headteacher, Director, or another appropriate adviser. Safeguarding action must not be delayed while the correct HR label is decided.

4. What is whistleblowing?

Whistleblowing is the disclosure of information relating to suspected wrongdoing, malpractice or danger. It may include:

- a criminal offence;
- failure to comply with a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any individual;
- damage to the environment;
- fraud, bribery, corruption, theft or serious financial irregularity;
- serious professional or ethical misconduct;
- unsafe safeguarding practice or a failure to protect children;
- deliberate concealment of information about any of these matters; or
- other serious wrongdoing affecting the School community or public interest.

A person does not need to prove the wrongdoing before raising a concern. They should have a reasonable belief in the information they disclose and raise it honestly.

5. Whistleblowing and safeguarding

Keeping Children Safe in Education 2026 requires staff to be able to raise concerns about poor or unsafe safeguarding practice and potential failures in the School's safeguarding regime. Staff must know the School's whistleblowing procedures and suitable external routes.

Whistleblowing does not replace the immediate safeguarding reporting procedure. A concern that a child is in immediate danger, or an allegation/concern about an adult who may pose a risk to children, must be acted upon immediately through the Safeguarding & Child Protection Policy.

Concern	Primary route
Concern about a child	DSL/DDSL immediately; anyone may refer directly to children's social care where necessary.
Concern/allegation about a member of staff, volunteer, contractor or other adult	Headteacher/case manager immediately; harm-threshold concerns considered with LADO.
Concern/allegation about the Headteacher	Director/Proprietor immediately; Headteacher is not informed first.
Concern that safeguarding practice is unsafe or a genuine concern is not being acted upon	Escalate internally and/or use this Whistleblowing Policy; external safeguarding routes remain available.
Immediate danger or emergency	999/emergency services and safeguarding route.

A member of staff must not wait for internal whistleblowing stages to be exhausted before making a necessary child-protection referral or contacting the LADO, police or another safeguarding authority where the circumstances require it.

6. Who to raise a concern with

6.1 Line manager

Where appropriate, a concern may initially be raised with the person's line manager, orally or in writing. The line manager must take the concern seriously and escalate it where it cannot safely or properly be resolved at that level.

6.2 Headteacher

A worker may raise a concern directly with the Headteacher, Euan Burton-Smith, where the matter is serious, involves their line manager, has not been addressed, or they simply prefer to bypass normal line management.

6.3 Director / Proprietor

A concern should be raised directly with Chris Sellers, Director/Proprietor, where it concerns the Headteacher, there is a conflict of interest, the worker believes the Headteacher has not dealt with the concern properly, or the worker reasonably believes it is inappropriate to report to the Headteacher.

A safeguarding concern about the Headteacher must be reported to the Director under the Safeguarding Policy and not routed back to the Headteacher.

7. How to raise a concern

A concern may be raised orally or in writing. A worker should provide as much factual information as they reasonably can, including what happened, when, who was involved, why they are concerned and any relevant documents or witnesses. Lack of documentary proof is not a reason to remain silent.

A meeting will normally be arranged as soon as reasonably possible. The worker may be accompanied by a workplace colleague or trade union representative where appropriate. The companion must respect confidentiality.

The person receiving the concern will make a written record and confirm the key issues with the worker. Safeguarding information will be recorded and stored in the appropriate safeguarding system rather than only in an HR whistleblowing file.

8. Confidentiality

The School hopes workers will feel able to speak openly. Where a person asks for confidentiality, the School will take reasonable steps to protect their identity.

Confidentiality cannot be guaranteed absolutely. The identity of the whistleblower may need to be disclosed where necessary to investigate fairly, safeguard a child, comply with law or enable external agencies to act. Where practicable, this will be discussed with the whistleblower first.

Information will be shared on a need-to-know basis. The School will not disclose the identity of a whistleblower merely because disclosure would be convenient.

9. Anonymous concerns

The School encourages named concerns because investigation and feedback are often easier. However, an anonymous concern will not be ignored merely because the reporter has withheld their identity.

The School will assess an anonymous report according to seriousness, credibility, specificity, safeguarding risk and the information available. Safeguarding concerns will be acted on according to risk regardless of anonymity.

10. Investigation and response

The School will decide the appropriate response according to the nature of the concern. This may include management review, safeguarding action, HR/disciplinary investigation, financial investigation, health and safety action, referral to LADO, children's social care, police, DBS, TRA, Ofsted or another regulator/authority as appropriate.

The investigator will be sufficiently independent of the matters complained of. Where the Headteacher or another senior person is implicated, the Director will determine an appropriate independent route.

The whistleblower may be asked for further information. The School will seek to progress matters promptly and will keep the whistleblower informed of progress so far as reasonably possible.

The whistleblower may not be entitled to confidential information about another person, detailed disciplinary outcomes or safeguarding information. The School will nevertheless confirm, where it lawfully can, that the concern has been considered and whether appropriate action has been taken.

The 2025 policy stated that police would be informed 'in all cases' where there was evidence of criminal activity. That blanket rule is removed. Police involvement will be considered where a crime may have been committed and will follow the nature, seriousness and safeguarding context of the matter and applicable statutory guidance.

11. If the concern is not addressed

A worker who reasonably believes that a genuine concern has not been addressed should escalate it. They may:

- raise it with the Director/Proprietor if not already done;
- use the safeguarding escalation routes in the Safeguarding & Child Protection Policy;
- seek confidential advice from Protect;
- contact the NSPCC Whistleblowing Advice Line for safeguarding concerns;
- contact Kirklees LADO directly where the concern relates to an adult working with children and the safeguarding threshold may be relevant;
- make a referral to children's social care where a child may be at risk;
- contact police where immediate danger or a criminal matter requires police action; or
- make a protected disclosure to an appropriate prescribed person/body where the legal conditions are met.

12. External disclosures and prescribed persons

The School encourages internal reporting where this is safe and appropriate, but the 2025 policy's statement that external reporting should occur only 'where all internal procedures have been exhausted' is removed. The law

does not impose a universal requirement to exhaust every internal stage before a protected disclosure can be made to an appropriate external body.

Workers considering an external disclosure should seek advice where possible because the legal conditions differ depending on whom the disclosure is made to. The government maintains a current list of prescribed persons and bodies to whom protected disclosures may be made about matters within their remit.

The former reference to the Audit Commission is removed because the Audit Commission was abolished in 2015 and is not an appropriate current generic whistleblowing route.

External bodies may include, depending on the subject matter, HMRC, the Health and Safety Executive, Ofsted, relevant local-authority safeguarding services, professional/regulatory bodies, police or other bodies included in the current prescribed-persons order/list. A worker should use the body whose remit matches the concern.

Disclosure to the media or the wider public carries stricter legal conditions than disclosure to an employer or prescribed person. Workers are strongly encouraged to obtain independent advice before making a wider disclosure.

13. Safeguarding external contacts

Route	Contact	When relevant
Kirklees LADO	01484 221126 LADO.cases@kirklees.gov.uk	Concern/allegation about an adult in a position of trust that may meet the harm threshold.
Kirklees Children's Social Care – Duty & Advice	01484 414960 DutyAdvice.Admin@kirklees.gov.uk	Concern that a child may need statutory safeguarding assessment/support.
NSPCC Whistleblowing Advice Line	0800 028 0285	Advice/support for professionals with concerns about how child-protection issues are being handled in their organisation.
NSPCC Helpline	0808 800 5000	General advice/reporting about concerns for a child.
Police	999 emergency 101 non-emergency	Immediate danger or police/crime matter as appropriate.

14. Protect – independent whistleblowing advice

Protect is an independent whistleblowing charity. Workers may seek confidential advice about whether and how to raise a concern.

Telephone: 020 3117 2520. Advice/contact information should be checked against Protect's current published details before policy issue if the School becomes aware of a change.

The 2025 policy gave 020 3117 2502. This has been corrected to Protect's current advice-line number.

15. Protection from detriment and victimisation

The School will not subject a worker to detrimental treatment because they have made a protected disclosure. Detriment may include dismissal, disciplinary action, threats, intimidation, bullying, loss of opportunity or other disadvantage.

Anyone who threatens, retaliates against or victimises a whistleblower may be subject to disciplinary action.

A worker who believes they have suffered detriment should tell the Headteacher or Director immediately, depending on who is implicated, and may seek independent legal or trade-union advice.

The 2025 policy made protection conditional on the concern being raised 'in good faith and following the Whistleblowing procedures'. That wording is removed. The Public Interest Disclosure Act/Employment Rights Act framework focuses on the worker's reasonable belief and public-interest disclosure; 'good faith' is not a condition for whistleblower protection, although motive can be relevant to compensation in tribunal proceedings.

16. False or malicious allegations

A person will not face disciplinary action merely because a concern is mistaken or not substantiated. The School's previous reference to 'false, malicious, vexatious or frivolous accusations' is narrowed: disciplinary action may be considered where there is evidence that a person knowingly made a false allegation or acted maliciously or dishonestly.

A concern that is difficult to prove, appears unusual, is unpopular or ultimately turns out to be wrong is not by itself malicious.

17. Whistleblowing, grievance and complaints

A personal employment complaint will normally be considered under the Grievance Procedure. A complaint from a parent will normally fall under the Complaints Procedure. A safeguarding allegation against an adult follows the Safeguarding Policy.

Where issues overlap, the School may use more than one procedure or determine a lead procedure. The need to safeguard a child or preserve evidence takes priority over procedural neatness.

18. Record keeping and data protection

Whistleblowing records will be kept securely with access restricted to those who need it. Records will distinguish the concern raised, risk/triage, decisions, investigation, referrals, outcome, feedback and any protection/support measures.

Safeguarding information will be recorded in accordance with the Safeguarding Policy and retained according to safeguarding requirements. HR or financial records will be retained according to the applicable retention schedule. Personal data will be processed in accordance with UK GDPR and the Data Protection Act 2018.

19. Training, awareness and safeguarding culture

Staff will be made aware of this policy at induction and through safeguarding updates. They will know how to report concerns about a child, concerns about adults, concerns about the Headteacher and concerns that safeguarding practice is unsafe or not being acted upon.

Leaders will promote a culture in which staff can challenge unsafe practice and professional disagreement without fear. The Director will seek assurance that staff know the whistleblowing route and that concerns are not suppressed, minimised or redirected inappropriately.

20. Monitoring and review

The Director/Proprietor will oversee the effectiveness of this policy. The School will review themes from whistleblowing concerns, grievances, low-level concerns, allegations, complaints and safeguarding cases to identify patterns or cultural issues, while protecting confidentiality.

This policy will be reviewed at least annually and sooner following a significant concern, legal or statutory-guidance change, inspection finding or learning from a case.

It must be read alongside the Safeguarding & Child Protection Policy 2026–2027, Staff Disciplinary and Conduct Policy, Grievance Procedure, Complaints Procedure and other relevant School policies.

Appendix A – Staff quick guide

If you are worried about...	Do this
A child	Tell DSL/DDSL immediately. If necessary, refer directly to children's social care/police.
A member of staff/adult and a child	Tell Headteacher immediately. Headteacher considers LADO; do not

	investigate first.
The Headteacher and a child	Tell Director immediately. Do not tell the Headteacher first.
Unsafe safeguarding practice	Raise with Headteacher/Director and use whistleblowing escalation if needed.
Concern being ignored	Escalate. Internal stages do not have to be exhausted before necessary safeguarding action.
Fear of reprisal	Contact Director and/or seek confidential advice from Protect or NSPCC whistleblowing line.
Immediate danger	Call 999 and inform safeguarding lead as soon as possible.