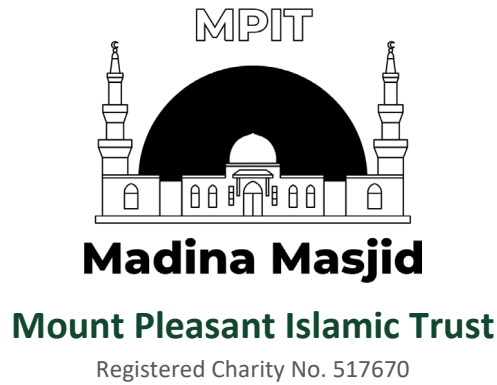




WHISTLEBLOWING POLICY

Governance and Accountability Policy | Draft for Executive Committee approval

Document Title	Whistleblowing Policy
Policy Reference	MPIT-POL-003
Version	2.0
Status	Draft for Executive Committee approval
Policy Owner	Chair of Trustees
Author / Reviser	Mount Pleasant Islamic Trust
Approved by	MPIT Executive Committee (Board of Trustees)
Date Approved	To be confirmed on adoption
Effective From	To be confirmed on adoption
Review Cycle	Annual
Next Review Due	12 months from adoption
Classification	Public (for publication)

Version History

This table records all amendments to this policy. Every material change must be approved by the Executive Committee (Board of Trustees) before it takes effect, and the approval recorded in the minutes.

Version	Date	Author	Summary of Changes	Approved by
1.0	Sep 2022	MPIT	Initial policy approved (single internal route via the Madrasah Secretary).	Board
2.0	To be confirmed	MPIT	Comprehensive revision. Adds two named internal routes (a designated Whistleblowing Officer and the Chair); extends the policy explicitly to volunteers, sessional teachers and trustees; welcomes serious public-interest concerns from parents, worshippers and members of the public; aligns availability with evening and weekend sessions; sets out a defined investigation process and feedback to the whistleblower; adds recording and Board reporting; replaces the decommissioned Charity Commission address with current external routes (Charity Commission, Ofsted, Protect, NSPCC); adds a safeguarding hand-off; and interlocks with the Complaints and Grievance routes. Full document and version control.	Pending

1. Purpose and Statement of Intent

Mount Pleasant Islamic Trust (“the Trust”, “MPIT”, “we”) is committed to conducting its affairs with honesty, integrity and openness, and to keeping safe everyone who takes part in its work through Madina Masjid, Madrasah Islamiyah and Darul Arqam Nursery. We recognise that, even in a well-run organisation, things can go wrong, and that the people most likely to know are often those who work or volunteer here.

This policy exists so that anyone who has a genuine concern about serious wrongdoing, malpractice or danger connected with the Trust can raise it, knowing that they will be listened to, taken seriously, and protected from suffering any disadvantage for speaking up. Raising such a concern is known as whistleblowing, or making a protected disclosure.

Speak up. If you believe something seriously wrong or dangerous is happening at the Trust, tell us. You do not need to prove it, and you will not be penalised for raising a genuine concern in good faith, even if it turns out to be mistaken.

Whistleblowing is not the same as a personal complaint about a service (which is dealt with under the Complaints Policy) or a personal grievance about your own employment (which is dealt with under the Grievance Procedure). It is about raising a concern in the public interest, on behalf of others, rather than pursuing a matter that affects only you. Section 2 explains the difference.

This policy reflects the protections given to whistleblowers by the Public Interest Disclosure Act 1998 (which forms part of the Employment Rights Act 1996), the Charity Commission's guidance on whistleblowing, and, for Darul Arqam Nursery, the whistleblowing requirements of the Early Years Foundation Stage framework. Mount Pleasant Islamic Trust is a charity registered in England and Wales (registered charity number 517670) and governed by its Constitution.

2. Scope and Applicability

Who this policy is for

This policy applies across the whole of the Trust's work, at the Masjid, Madrasah Islamiyah and Darul Arqam Nursery. The Trust wants everyone connected with its work to feel able to speak up, and so this policy applies to, and its protections are extended by the Trust to, all of the following:

- employees and paid staff at every level;
- sessional and supplementary-school teachers, including those who teach Madrasah evening and weekend classes;
- volunteers of every kind, regular or occasional;
- trustees, Executive Committee members and Office Bearers;
- contractors, agency workers and those on work placements; and
- anyone else working for or with the Trust.

The law's whistleblowing protection (the Public Interest Disclosure Act 1998) applies to “workers”, which does not automatically include volunteers or trustees. The Trust has decided to go further than the law requires: it applies this policy, and the same protection from disadvantage, to volunteers, sessional teachers and trustees as well. No one who speaks up in good faith under this policy will be treated less favourably for doing so.

Concerns from parents, worshippers and members of the public

Whistleblowing law protects workers, but wrongdoing and danger can be noticed by anyone. The Trust therefore welcomes a serious concern about wrongdoing, malpractice or danger from anyone connected with its work, including parents and carers, worshippers, those who hire its facilities, and other members of the public. If you are not a worker or volunteer but you have such a concern, you can raise it with the Whistleblowing Officer or the Chair using the contacts in section 6.1, or take it directly to one of the external bodies in Appendix B. The Trust will not treat anyone, including a parent or worshipper, less favourably for raising a genuine concern in good faith.

Two things stay the same for the public. A personal complaint about a service, or about how you have been treated, is dealt with under the Complaints Policy, and a concern about the safety or welfare of a child is dealt with under the Safeguarding and Child Protection Policy. If you are unsure which applies, raise your concern anyway and it will be directed to the right place.

What this policy covers

You can raise a concern under this policy where you reasonably believe that it is in the public interest and that it tends to show that one or more of the following is happening, has happened, or is likely to happen:

- a criminal offence, including fraud, bribery or theft;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- a danger to the health and safety of any person;
- damage to the environment;
- the misuse or unauthorised use of the Trust's funds or charitable assets;
- abuse of a child or adult at risk, or a failure to safeguard them;
- conduct that is otherwise seriously improper, including the abuse of a position of trust; or
- the deliberate concealment of any of the above.

A concern raised in the public interest is covered even if it turns out to be mistaken, provided you held it honestly and reasonably. You do not need to be certain, and it is not for you to investigate or prove it.

What this policy does not cover

Some matters are dealt with under other procedures. If you raise one of these under this policy, we will tell you where it belongs and make sure it is passed on:

Matter	Where it is dealt with
A personal complaint about a service, decision or treatment (for a member of the public, parent or worshipper)	Complaints Policy.
A personal grievance about your own employment (for example pay, duties, or how a manager has treated you)	Grievance Procedure. Whistleblowing and grievance interlock: use whistleblowing for wrongdoing that affects others in the public interest, and the Grievance Procedure for a matter personal to you.
A safeguarding disclosure or an allegation that a child or adult at risk has been harmed or is at risk of harm	Safeguarding and Child Protection Policy. This is acted on immediately (see section 6.4); raising it here does not slow it down.

3. Definitions

For the purposes of this policy:

Whistleblowing	Raising a concern, in the public interest, about wrongdoing, malpractice or danger connected with the Trust. Also called making a disclosure.
Protected disclosure	A qualifying disclosure made in the way the law requires, which attracts legal protection for the worker who makes it under the Public Interest Disclosure Act 1998.
Qualifying disclosure	A disclosure of information which the person reasonably believes is in the public interest and tends to show one of the categories of wrongdoing listed in section 2.
Public interest	The concern affects others, such as the public, beneficiaries, children, staff or the Trust as a whole, rather than being a matter personal only to the individual raising it.
Whistleblowing Officer	The trustee designated by the Executive Committee to receive whistleblowing concerns, oversee how they are handled, keep the record, and report to the Board. This is one of two internal routes; the other is the Chair.
Detriment	Being treated less favourably because you have raised a concern, for example dismissal, disciplinary action, exclusion, withdrawal of duties, or being harassed or isolated.

Prescribed person

A body named in law to whom a worker may make a disclosure outside their organisation, such as the Charity Commission, Ofsted or the Health and Safety Executive.

4. Policy Principles

The Trust will handle whistleblowing in line with the following principles:

- **We want you to speak up.** It is better for a genuine concern to be raised and found groundless than for serious wrongdoing to go unreported because someone was unsure or afraid.
- **Protection from detriment.** No one who raises a genuine concern in good faith will be dismissed, disciplined, excluded or disadvantaged for doing so. This protection is given by the Trust to staff, volunteers, sessional teachers and trustees alike.
- **Confidentiality.** We will keep your identity confidential so far as we properly can, and will discuss with you before your name is shared. There are limits, explained in section 6.5.
- **Anonymous concerns are still considered.** We would rather know who you are so we can protect you and keep you informed, but a serious anonymous concern will still be looked into.
- **You do not need proof.** You are not expected to prove your concern. You need only a reasonable and honest belief that it may be true and is in the public interest.
- **Taken seriously and acted on.** Concerns are assessed promptly, investigated fairly and independently of the people involved, and acted on.
- **Recorded and overseen by the Board.** Concerns and their outcomes are recorded and reported to the Executive Committee, so that the Board has genuine oversight.
- **Available when the Trust operates.** You can raise a concern at any reasonable time, including during the evening and weekend sessions when the Madrasah runs, not only in weekday office hours.

5. Roles and Responsibilities

The following roles carry specific responsibilities under this policy:

Role	Responsibilities
Executive Committee (Board of Trustees)	- Own, approve and review this policy, and foster a culture in which people feel able to speak up. - Receive reports on whistleblowing concerns and their outcomes, and act on them. - Ensure a Whistleblowing Officer is designated and that whistleblowers are protected from detriment. - Decide, through members with no involvement, on concerns that relate to a trustee or to senior leadership.
Whistleblowing Officer (a designated trustee)	- Act as the main internal route for concerns; receive, acknowledge and record them. - Arrange for concerns to be assessed and investigated by someone independent of the matter. - Keep the whistleblower informed so far as it is appropriate, and report to the Executive Committee. - Pass any safeguarding matter to the Designated Safeguarding Lead immediately.
Chair of Trustees	- Act as the alternative internal route, and the route to use where a concern is about the Whistleblowing Officer. - Ensure serious concerns reach the Executive Committee without delay.
Managers, setting leads and supervisors	- Take seriously any concern raised with them, and pass it to the Whistleblowing Officer or Chair promptly. - Protect and support anyone who raises a concern, and never victimise them.
All staff, volunteers, sessional teachers and trustees	- Raise genuine concerns about wrongdoing or danger through this policy. - Co-operate with any investigation, and maintain confidentiality. - Never subject a whistleblower to any detriment.

6. Procedures

6.1 How to raise a concern

In most cases you can raise a concern with your line manager or setting lead, who will help you take it forward. If you would rather not, or the concern is about them, you can go straight to one of the Trust's two internal whistleblowing routes below. You do not have to decide which category your concern falls into; just raise it.

Internal route	How to contact them
Whistleblowing Officer (a designated trustee) Your main route	Name: [to be inserted on adoption] Email: [dedicated whistleblowing email, to be inserted] Telephone: [to be inserted]
Chair of Trustees An alternative route, and the route to use if your concern is about the Whistleblowing Officer	Name: [to be inserted on adoption] Email: [to be inserted]

You can also write, marking your letter "Private and confidential", to the relevant officer at Mount Pleasant Islamic Trust, Madina Masjid, Purlwell Lane, Batley WF17 7NQ.

You can raise a concern at any reasonable time, including during Madrasah evening and weekend sessions, and by email, telephone or in person. It usually helps to make contact by email first, but do whatever is easiest for you. Where there is an immediate risk to someone's safety, act at once and call the emergency services if needed.

When you raise a concern, it helps to give as much as you can of the following, though you should not delay raising it while you gather detail:

- your name and how you would like to be contacted (or a note that you wish to remain anonymous);
- what you are concerned about, and why;
- relevant dates, places, and the names or roles of anyone involved; and
- any documents or information that support the concern.

6.2 What happens after you raise a concern

Step	What happens
Acknowledge	The Whistleblowing Officer (or the Chair) acknowledges your concern in writing within five working days, and explains what will happen next.
Assess	The concern is assessed to decide how it should be handled: whether it is a whistleblowing matter, a safeguarding matter for immediate referral, or better dealt with under another policy.
Investigate	Where investigation is needed, it is carried out by a person with no involvement in the matter. They gather the facts fairly and give anyone affected a chance to respond. Outside help may be used where appropriate.
Protect	Steps are taken to protect you from any detriment, and to support you, while the matter is looked into.
Feedback	You will be told, so far as confidentiality and the law allow, how your concern has been handled and the outcome. You may not be told every detail, but you will know it was taken seriously.

Timescales depend on the seriousness and complexity of the concern. We aim to complete straightforward matters within a few weeks and will keep you informed if a matter takes longer.

6.3 If your concern is about the Whistleblowing Officer, the Chair or a trustee

A concern should never be received or investigated by the person it is about. Where your concern is about the Whistleblowing Officer, the Chair, or a trustee:

- raise it with the other of the two internal routes (for example, use the Chair if the concern is about the Whistleblowing Officer, and vice versa);
- it will be considered by members of the Executive Committee who have no involvement in the matter and no conflict of interest;
- where the concern is about the Executive Committee as a whole, or cannot be dealt with impartially inside the Trust, you may raise it directly with one of the external bodies in section 7.

6.4 Safeguarding concerns

If your concern is that a child or an adult at risk has been harmed, is at risk of harm, or that someone connected with the Trust has behaved in a way that harms or risks a child, it is passed to the Designated Safeguarding Lead immediately and dealt with under the Safeguarding and Child Protection Policy. It is not held over. You may also raise a child-safety concern directly with the NSPCC whistleblowing advice line or, for the Nursery, with Ofsted (see section 7).

6.5 Confidentiality and anonymous concerns

We will treat your concern in confidence and make every effort not to reveal your identity without your agreement. There are limits: your identity, or the information you give, may have to be shared if the matter leads to disciplinary action, a safeguarding referral, a police investigation or court proceedings, or where the law requires it. If that becomes likely, we will discuss it with you first wherever we can.

You may raise a concern anonymously. We would prefer to know who you are, so that we can protect and support you and keep you informed, and an anonymous concern is naturally harder to look into. Even so, an anonymous concern will be considered, taking account of how serious it is, how credible it is, and whether it can be investigated from other sources.

6.6 Recording concerns

The Whistleblowing Officer keeps a confidential record of concerns raised under this policy, including the date, the nature of the concern, how it was handled, the outcome, and any action taken. The record is held securely, with access restricted to those who need it, and is used to report to the Executive Committee (section 9). Recording a concern must never be used to identify or disadvantage the person who raised it.

7. Reporting, Escalation and Breach

Protection from detriment

No one who raises a genuine concern in good faith under this policy will be dismissed, disciplined, threatened, excluded or subjected to any other detriment for doing so, and this protection is extended by the Trust to volunteers, sessional teachers and trustees as well as employees. If you believe you have suffered, or are being threatened with, any detriment because you raised a concern, tell the Whistleblowing Officer or the Chair at once, and it will be treated as a serious matter in its own right. Victimising a whistleblower is a disciplinary matter (see below).

Raising a concern outside the Trust

We hope you will feel able to raise concerns with us, and in most cases that is the best way to get them put right. However, the law allows a worker to take a concern to a prescribed person or other appropriate external body, particularly where the matter is very serious, where raising it internally has not worked, or where you reasonably believe you would be victimised or that evidence would be concealed. The main external routes are set out in Appendix B. In summary:

- for concerns about how the charity is run, the Charity Commission, which is a prescribed person for charities (whistleblowing@charitycommission.gov.uk);
- for concerns about Darul Arqam Nursery, Ofsted, which is the prescribed person for early years ([whistleblowing hotline 0300 123 3155](tel:03001233155), whistleblowing@ofsted.gov.uk);
- for concerns about health and safety, the Health and Safety Executive;
- for free, confidential advice before or at any point, the independent whistleblowing charity Protect ([advice line 0800 055 7214](tel:08000557214)); and

- for concerns about the safety or welfare of a child, the NSPCC whistleblowing advice line (0800 028 0285).

It is best to take advice, for example from Protect, before making an external disclosure, so that you keep the protection the law gives you. This policy does not prevent you from making a disclosure to a prescribed person.

Untrue or malicious concerns

You will not face any action for raising a concern that is not upheld, provided you raised it honestly and in the reasonable belief that it was in the public interest. However, this protection does not extend to a concern that is known to be false, or that is made maliciously or for personal gain. Raising a knowingly false or malicious allegation may itself be treated as a disciplinary matter.

Breach of this policy

Anyone who subjects a whistleblower to detriment, who discourages or obstructs a genuine concern, or who breaches the confidentiality of the process, may be dealt with under the Disciplinary procedures. Where the person responsible is a trustee, the matter is dealt with under the Trustees' Code of Conduct and may, in a serious case, affect their position.

8. Training and Awareness

All staff, volunteers and sessional teachers are made aware of this policy and of how to raise a concern as part of their induction, and are reminded of it from time to time. The names and contact details of the Whistleblowing Officer and the Chair are displayed and shared so that everyone knows who to approach. The Whistleblowing Officer, managers and setting leads are briefed on how to receive a concern, protect the person who raises it, and handle it properly, including the safeguarding hand-off and the Nursery's whistleblowing duties under the Early Years Foundation Stage framework.

9. Monitoring, Review and Compliance

The Whistleblowing Officer reports to the Executive Committee on concerns raised under this policy and how they were resolved, in a way that protects the identity of those involved, and provides an annual overview so that the Board can see any patterns and satisfy itself that the policy is working. The Executive Committee reviews this policy at least once every twelve months, and sooner if there is a material change in the law, in regulatory guidance, or in the Trust's activities. Overall responsibility for this policy rests with the Executive Committee (Board of Trustees). The policy is published and made available to all staff, volunteers and sessional teachers.

10. Related Policies and Documents

This policy should be read together with:

- Complaints Policy (for personal complaints about a service);
- Grievance Procedure (for personal complaints about your own employment; the Madrasah grievance procedure provides an appeal to the Muhtamim);
- Safeguarding and Child Protection Policy (for concerns about a child or adult at risk);
- Disciplinary and Capability procedures;
- Data Protection and Privacy Policy;
- Code of Conduct (for staff, volunteers and trustees); and
- the Trust's Constitution (the governing document).

11. Regulatory References and Further Guidance

This policy is informed by the following. References are given by title; readers should always use the current version.

Legislation:

- Public Interest Disclosure Act 1998, which inserts the whistleblowing provisions (Part IVA) into the Employment Rights Act 1996;
- Public Interest Disclosure (Prescribed Persons) Order 2014, which lists the bodies a worker may disclose to externally;
- Employment Rights Act 1996, on protection from detriment and unfair dismissal for making a protected disclosure;
- the Early Years Foundation Stage statutory framework (in force from 1 September 2025), which requires Darul Arqam Nursery to have whistleblowing procedures for staff to raise safeguarding concerns.

Charity regulation and guidance:

- Charity Commission for England and Wales: guidance on whistleblowing and reporting serious wrongdoing at a charity;
- Charity Governance Code: the principles on integrity and on openness and accountability.

Advice and further guidance:

- GOV.UK: whistleblowing for employees, and the guidance and code of practice for employers;
- Protect (the whistleblowing charity): confidential advice for people considering raising a concern;
- NSPCC: whistleblowing advice line for concerns about the safety and welfare of children.

Appendix A: Whistleblowing Disclosure Form

You do not have to use this form to raise a concern, and you can raise one by any of the routes in section 6.1. This form is here to help if you would like a structure. If you need help to complete it, ask the Whistleblowing Officer.

Your name	(you may leave this blank if you wish to remain anonymous)
How we can contact you	Phone: Email: Other:
Your role or connection to the Trust	Staff / Volunteer / Sessional teacher / Trustee / Contractor / Other:
Which part of the Trust does your concern relate to?	Masjid / Madrasah Islamiyah / Darul Arqam Nursery / Trust-wide / Other:
What is your concern? (what is happening, and why you believe it is wrong or dangerous)	
Relevant dates, places and people involved	
Have you raised this before, and with whom?	
Is anyone at immediate risk?	Yes / No. If yes, what action has been taken:
Signature (if not anonymous)	
Date	

Please give this form to the Whistleblowing Officer or the Chair, marked "Private and confidential". For office use: date received _____ received by _____ reference _____.

Appendix B: External contacts

You can take a concern to an appropriate external body, particularly where you cannot raise it internally, where raising it internally has not worked, or where the matter is very serious. Taking advice first, for example from Protect, helps you keep the protection the law gives you.

Body	When and how to contact them
Charity Commission for England and Wales	The prescribed person for concerns about how a charity is run. Email: whistleblowing@charitycommission.gov.uk
Ofsted	The prescribed person for early years and childcare, for concerns about Darul Arqam Nursery. Whistleblowing hotline: 0300 123 3155 (Monday to Friday, 8am to 6pm) Email: whistleblowing@ofsted.gov.uk
Health and Safety Executive (HSE)	The prescribed person for concerns about health and safety at work. Report online at hse.gov.uk .
Protect	Independent whistleblowing charity offering free, confidential advice to anyone thinking about raising a concern. Advice line: 0800 055 7214 Website: protect-advice.org.uk
NSPCC Whistleblowing Advice Line	For concerns about the safety or welfare of a child where you are unsure how to proceed. Telephone: 0800 028 0285 Email: help@nspcc.org.uk
Emergency services	Where a person is in immediate danger, or a crime is in progress, call 999.

Appendix C: Raising a concern – at a glance

Step	What to do
1. Speak up	Raise your concern with your line manager or setting lead, or go straight to the Whistleblowing Officer or the Chair (section 6.1). You do not need proof, only an honest, reasonable concern in the public interest.
2. We respond	Your concern is acknowledged within five working days, assessed, and where needed investigated by someone with no involvement in it.
3. You are protected	You will not be disadvantaged for raising a genuine concern. Tell us at once if anyone treats you unfairly for speaking up.
4. You hear back	You will be told how your concern was handled and the outcome, so far as confidentiality and the law allow.
5. If needed, go external	If you cannot raise it internally or it is not resolved, you can go to a prescribed person such as the Charity Commission or Ofsted, or take advice from Protect (Appendix B).

If your concern is about the safety or welfare of a child, it goes straight to our Designated Safeguarding Lead and is dealt with under our Safeguarding and Child Protection Policy. You can also contact the NSPCC or, for the Nursery, Ofsted.

Adoption and Approval

This policy was formally adopted by the Executive Committee (Board of Trustees) of Mount Pleasant Islamic Trust by majority vote at a duly convened meeting, with the decision recorded in the minutes in accordance with the Constitution (clause 12.2). The date of adoption is recorded in the document control table on the cover page.

In adopting this policy, the Executive Committee confirms that:

- it has reviewed the contents and considers them appropriate to the Trust's size, activities and risk profile;
- it is satisfied that adequate arrangements are in place to put the policy into practice across the Masjid, Madrasah Islamiyah and Darul Arqam Nursery as applicable;
- it will receive reports on the operation of this policy as part of its standing governance oversight; and
- the policy will be reviewed in accordance with the review cycle stated on the cover page, or sooner if circumstances require.

Signed (Chair):

Name:

Signed (Secretary):

Name:

Date of adoption:
