The Olympus Academy Trust
Whistleblowing Policy

Document Summary

Document Owner:	Head of HR
Version:	3.3
Document Status:	**Approved**
Date Last Approved:	25th November 2025
Date of Next Review:	25th November 2028
Review Frequency:	Every 3 years
Owner: (Olympus or School)	Olympus
Governing Committee:	Remuneration & Nominations Committee/ Joint Consultation and Negotiations Committee
Statutory or Optional policy:	Statutory
Appendices:	None
On Trust Website?	Yes
On School Websites?	Yes
Consulted with JCNC. Y/N or not applicable	**Yes – 15th September 2025**

Amendment History

Version	Amendment Date	Author	Amendment Summary
v2.0	June 2022	Policy Coordinator	• Updated to standard format
V3.0	30 May 2025	Head of HR	• Section 4.7 Expanded list of prescribed persons given the Public Interest Disclosure (Prescribed Persons) (Amendment) Order 2025
V3.1	25 July 2025	Head of HR	• Including sexual harassment as a qualifying disclosure
V3.2	15 Sept 25	Head of HR	• Consulted with JCNC • DEI Statement added
V3.3	25th November 2025	Policy coordinator	• Approved by RNC

1. Introduction

1.1. This policy applies to all employees, Trustees of the Trust and other workers who may be involved in the running of the Trust at any time. Other individuals performing functions in relation to the Trust, such as agency workers consultants and contractors, are encouraged to use it.

1.2. This policy has been developed in consultation with recognised trade unions and professional organisations, to implement the provisions of the Public Interest Disclosure Act 1998. The Act protects workers from detrimental treatment or victimisation from their employer if, in the public interest, they blow the whistle on wrongdoing.

1.3. It is important to the Trust that any fraud, misconduct or wrongdoing by workers1 of the Trust is reported and properly dealt with. The Trust therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the Trust or the way in which the Trust is run. This policy sets out the way in which workers may raise any concerns that they have and how those concerns will be dealt with.

1.4. For the purposes of this policy the definition of 'worker' includes employees, Trustees, Governors and other workers involved in the running of the Trust at any time.

2. Background

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

- a criminal offence;
- a miscarriage of justice;
- financial irregularities including fraud, corruption or unauthorised use of public funds;
- failure to observe health and safety regulations, or action which involves risks to the public or other employees;
- an act causing damage to the environment;
- other cases of malpractice or unethical action;
- a breach of any other legal obligation; or
- concealment of any of the above;
- sexual harassment;

2.2. is being, has been, or is likely to be, committed. It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The worker has no responsibility for investigating the matter - it is the Trust's responsibility to ensure that an investigation takes place.

2.3. A worker who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because he/she has made a disclosure.

2.4. The Trust encourages individuals to raise their concerns under this procedure in the first instance. If the individual is not sure whether or not to raise a concern, they should discuss the issue with their line manager/Headteacher, other member of the Trust's senior leadership team or a member of the HR department.

2.5. The NSPCC operate The Whistleblowing Advice Line which offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation. They can be contacted on 0800 028 0285 or by emailing them directly using help@nspcc.org.uk.

3. Principles

3.1. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employee, Trustees and other workers should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

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

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

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

3.5. If misconduct is discovered as a result of any investigation under this procedure the Trust's disciplinary procedure will be used, in addition to any appropriate external measures.

3.6. Maliciously making a false allegation is a disciplinary offence.

3.7. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority within the Trust, workers should not agree to remain silent. They should escalate the matter and report their concerns to a more senior member of the Trust's leadership team.

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

4. Procedure

4.1. Stage 1 - In the first instance, and unless the worker reasonably believes his/her line manager/Headteacher to be involved in the wrongdoing, or if for any other reason the worker does not wish to approach his/her line manager/Headteacher, any concerns should be raised with the worker's line manager/Headteacher. If he/she believes the line manager/Headteacher to be involved, or for any reason does not wish to approach the line manager/Headteacher, then the worker should proceed straight to stage 3.

4.2. Stage 2 - The line manager/Headteacher will arrange an investigation into the matter (either by investigating the matter him/herself or immediately passing the issue to someone in a more senior position within the Trust). The investigation may involve the worker and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. The worker's statement will be taken into account, and he/she will be asked to comment on any additional evidence obtained.

4.3. The line manager/Headteacher (or the person who carried out the investigation) will then report to the Board, which will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency. If disciplinary action is required, the line manager/Headteacher (or the person who carried out the investigation) will report the matter to the HR department so that action under the disciplinary procedure can commence.

4.4. On conclusion of any investigation, the worker will be told the outcome of the investigation and what the Board has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

4.5. Stage 3 - If the worker is concerned that his/her line manager/Headteacher is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the Board, he/she should inform a member of the Trust's Executive Leadership team2, who will arrange for another senior leader to review the investigation carried out, make any necessary enquiries and make his/her own report to the Board as in stage 2 above.

4.6. If for any other reason the worker does not wish to approach his/her line manager/Headteacher, they should also in the first instance contact the Trust's Executive Leadership team. Any approach to the Executive Leadership Team will be treated with the strictest confidence and the worker's identity will not be disclosed without his/her prior consent.

4.7. If on conclusion of stages 1, 2 and 3, the worker reasonably believes that the appropriate action has not been taken, he/she should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs;
- the Financial Conduct Authority (formerly the Financial Services Authority);
- the Competition and Markets Authority;
- the Health and Safety Executive;
- the Environment Agency;
- the Independent Office for Police Conduct;
- the Serious Fraud Office;
- The Treasury;
- The Secretary of State for Business and Trade;
- The Secretary of State for Transport.

5. Confidentiality

5.1. All reported disclosures will be treated in confidence, with every effort made by the Trust and/or Board not to reveal an employee's identity if they so wish. At the appropriate time, however, an employee may need to appear as a witness; in these circumstances appropriate support and/or protection arrangements will be discussed with the whistle- blower.

5.2. Employees raising concerns under this policy, and any person to whom allegations are disclosed, must ensure that they maintain confidentiality towards all parties, including external groups i.e. pupils, parents and the wider school community.

5.3. The Trust's Executive Leadership team includes CEO, Executive Headteacher, Head of HR, Head of Business Operations and the Executive Office Manager.

6. Anonymous Allegations

6.1. Employees should put their name to an allegation whenever possible. All allegations will be investigated, although employees need to be aware that anonymous allegations are much less powerful and are more difficult to act upon. In considering an anonymous allegation, the following factors will be taken into account:

- the seriousness of the matter raised.
- the credibility of the allegation made.
- The likelihood of obtaining information from other sources which can confirm

7. Data protection

7.1. When an individual makes a disclosure, the Trust will process any personal data collected in accordance with its data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

8. Diversity, Equity and Inclusion Statement

We are committed to fostering a diverse, equitable, and inclusive environment where every individual is valued and respected. Our policies reflect our dedication to creating a workplace that embraces differences and promotes fairness. We believe that diversity enriches our organisation and drives innovation, and we strive to ensure that all employees have equal opportunities to succeed and thrive.