



Whistleblowing Policy

Version	1
Owner	Audit and Risk Committee
Approving body	Board of Directors
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Review frequency	Three years
Review date	1 July 2029

See Appendix A for version history

Whistleblowing Policy

1. Purpose

- 1.1. Boomsatsuma Education Ltd ('Boomsatsuma') is committed to conducting its activities with honesty, integrity, accountability, and transparency. This Policy provides a framework for raising concerns about suspected wrongdoing, misconduct, unlawful activity, or other serious matters affecting Boomsatsuma, its students, staff, or wider stakeholders.
- 1.2. Boomsatsuma encourages individuals to raise concerns where they reasonably believe that wrongdoing, unlawful conduct, regulatory breaches, financial misconduct, risks to health and safety, safeguarding concerns, or other serious issues may have occurred, are occurring, or are likely to occur. Concerns raised under this Policy will be taken seriously and considered appropriately and proportionately.

2. Scope

- 2.1. This Policy applies to all individuals acting on behalf of Boomsatsuma, including:
 - Members of the Board of Directors
 - Members of committees, panels, and working groups
 - Employees
 - Workers and casual staff
 - Contractors and consultants
 - Agency workers
 - Volunteers
 - External advisers
 - Any other individuals involved in governance, management, or operational activities on behalf of Boomsatsuma.

- 2.2. This Policy does not form part of any contract of employment or engagement and may be amended from time to time.

3. Definitions

- 3.1. For the purposes of this Policy, 'whistleblowing' is defined as the disclosure of information relating to suspected wrongdoing, misconduct, unlawful activity, or other serious concerns affecting Boomsatsuma. Certain disclosures are protected by law under the Public Interest Disclosure Act 1998 [\[Link\]](#).
- 3.2. Whistleblowing concerns may include, but are not limited to:
- A criminal offence has been committed, is being committed, or is likely to be committed
 - There has been a failure to comply with a legal, professional, or regulatory obligation
 - Fraud, bribery, corruption, financial misconduct, or misuse of funds has occurred
 - Activity has posed, or may pose, a risk to health and safety
 - Safeguarding concerns have arisen
 - Information relating to wrongdoing or misconduct has been deliberately concealed
 - There has been a serious failure in governance, management, or regulatory compliance.
- 3.3. Whistleblowing concerns will normally relate to matters affecting others, the wider organisation, or the public interest, rather than matters affecting an individual only. Personal grievances or complaints are not normally covered by this Policy.

4. Principles

- 4.1. Individuals raising concerns under this Policy are expected to do so honestly, responsibly, and in good faith.

- 4.2. Boomsatsuma encourages whistleblowing concerns to be raised at the earliest appropriate opportunity so that issues can be considered and addressed promptly and proportionately.
- 4.3. Whistleblowing concerns will be treated seriously and handled fairly, sensitively, and, where reasonably practicable, confidentially.
- 4.4. Individuals raising whistleblowing concerns in good faith will not be subject to dismissal, detriment, victimisation, or other unfavourable treatment as a result of raising a concern.

5. Responsibilities

- 5.1. All individuals covered by this Policy are expected to:
 - Raise whistleblowing concerns promptly where they reasonably believe wrongdoing or serious misconduct may have occurred
 - Provide information honestly and in good faith
 - Cooperate appropriately with any enquiries or investigations arising under this Policy.
- 5.2. Line managers are responsible for:
 - Supporting an appropriate environment in which whistleblowing concerns can be raised informally
 - Offering advice on appropriate next steps, including escalation where necessary
 - Seeking advice from Human Resources (HR) where appropriate.
- 5.3. HR is responsible for supporting the administration of this Policy, including supporting the handling and recording of whistleblowing concerns.

- 5.4. The Executive Committee is responsible for supporting the effective implementation of this Policy across Boomsatsuma and ensuring that whistleblowing concerns are considered and escalated appropriately.
- 5.5. The Audit and Risk Committee is responsible for oversight and periodic review of this Policy and for monitoring the effectiveness of whistleblowing arrangements and any significant themes or concerns arising.
- 5.6. The Board of Directors retains overall accountability for ensuring that Boomsatsuma maintains effective arrangements for the identification, escalation, and management of serious concerns and wrongdoing, including those raised through whistleblowing.

6. Raising Concerns Informally

- 6.1. Individuals are encouraged, where appropriate, to raise whistleblowing concerns initially with their line manager. Concerns raised informally do not need to be made in writing.
- 6.2. Line managers may seek advice from HR and, where appropriate, may escalate whistleblowing concerns to a member of the Executive Committee.
- 6.3. Where a whistleblowing concern relates to the individual's line manager, or where the individual does not feel comfortable raising the matter with them, the concern may be raised with another appropriate manager, HR, or through the formal process set out below.

7. Raising Concerns Formally

- 7.1. Where a whistleblowing concern cannot be resolved informally, or where the matter is sufficiently serious, concerns should be raised formally by email to whistleblowing@boomsatsuma.com.

- 7.2. Individuals should provide as much relevant information as possible, including the nature of the concern, relevant facts, dates, individuals involved, and any supporting information available.

8. Handling Whistleblowing Concerns

- 8.1. Whistleblowing concerns will be considered carefully and proportionately. Boomsatsuma may make enquiries, undertake an investigation, seek further information, or refer matters through other appropriate procedures where necessary.
- 8.2. Where appropriate, an individual raising whistleblowing concerns may be invited to discuss the matter further and provide additional information to support the consideration or investigation of the concern.
- 8.3. Investigations will be conducted by an Investigating Officer, normally an appropriate manager, member of the Executive Committee, or other suitable individual, taking account of the nature of the concern and any actual, potential, or perceived conflicts of interest.
- 8.4. Following consideration or investigation of a whistleblowing concern, Boomsatsuma may:
- Take no further action
 - Make recommendations such as policy review, training or mediation
 - Refer the matter through relevant procedures for appropriate action
 - Refer the matter to the police in the case of alleged criminal activity
 - Take disciplinary or other appropriate action where concerns are found to have been raised maliciously, in bad faith, or with knowingly false information.
- 8.5. Where possible, individuals raising whistleblowing concerns will be informed of the progress or outcome of matters they have raised. However, there may be circumstances where information cannot be shared for reasons of confidentiality, legal obligations, or the rights of other individuals.

- 8.6. Where an individual is dissatisfied with the handling of a whistleblowing concern, they may raise this by email to whistleblowing@boomsatsuma.com.

9. Concerns Involving the Executive Committee or Governance

- 9.1. Where a whistleblowing concern relates to a member of the Executive Committee, this should be stated within the disclosure so that the matter may be referred directly to the Chair of the Board of Directors for appropriate consideration and oversight.
- 9.2. Where a concern relates to the Chair of the Board of Directors, the matter may be referred directly to another non-conflicted member of the Board of Directors.
- 9.3. Any individual involved in the consideration or handling of whistleblowing concerns must declare and appropriately manage any actual, potential, or perceived conflict of interest.

10. Confidentiality and Protection from Detriment

- 10.1. Boomsatsuma recognises that whistleblowing concerns may involve sensitive matters. Information relating to concerns raised under this Policy will therefore be handled sensitively and shared only on a need-to-know basis.
- 10.2. Boomsatsuma encourages individuals to identify themselves when raising whistleblowing concerns, as anonymous disclosures may be more difficult to investigate or assess appropriately.
- 10.3. Individuals who raise whistleblowing concerns honestly and in good faith will not be subject to dismissal, victimisation, retaliation, or other detrimental treatment as a result of raising a concern.

- 10.4. Any individual found to have subjected another person to detrimental treatment as a result of raising a whistleblowing concern may be subject to disciplinary action.

11. External Disclosures

- 11.1. Boomsatsuma encourages whistleblowing concerns to be raised internally wherever reasonably possible so that matters can be addressed appropriately and proportionately.
- 11.2. Nothing in this Policy prevents an individual from making a protected disclosure or reporting concerns to an appropriate external authority, regulator, professional body, or law enforcement agency where permitted or required by law.
- 11.3. Individuals may wish to seek independent advice on whistleblowing, confidentiality, and protection from detriment from Protect, the whistleblowing charity. Further information is available at protect-advice.org.uk or call the advice line (020 3117 2520).

12. Abuse of this Policy

- 12.1. Individuals raising whistleblowing concerns are expected to act honestly and in good faith. Individuals will not be subject to disciplinary action or other detriment solely because a concern raised under this Policy is not upheld or is ultimately mistaken.
- 12.2. Where concerns are found to have been raised maliciously, in bad faith, or where an individual knowingly provides false information, Boomsatsuma may address the matter through appropriate procedures, including disciplinary action where applicable.

13. Review

- 13.1. This Policy will be reviewed periodically by the Audit and Risk Committee to ensure it remains aligned with relevant legislation, regulatory expectations, and provider practice.

Appendix A – Version History

Version	Date	Changes
1	10 June 2026	New draft