Whistleblowing Policy

Statement and Purpose of Policy

1. Buzzers Academies Ltd (the **Employer**, **we**, **our** or **us**) is committed to upholding and providing information about our **Staff Members**' rights in relation to making qualified and protected disclosures (i.e. whistleblowing), to help our organisation operate with honesty and integrity. We expect all Staff Members to maintain high standards; however, we recognise that all organisations face the risk of things going wrong from time to time and the risk of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential for preventing such situations from occurring and for addressing them when they do.

2. All Staff Members should have the confidence to raise a suspected wrongdoing and should know that it will be taken seriously and investigated as appropriate. Staff Members raising genuine concerns should be able to do so without fear of reprisals, even if the Staff Member turns out to be mistaken.

3. Any questions in relation to this Policy should be referred to the company Managing Director (Matt Walker) in the first instance.

Scope of This Policy

4. This Policy explains the law on whistleblowing and provides Staff Members with guidance as to how to raise any malpractice or wrongdoing concerns.

5. This Policy applies to all individuals working for Buzzers Academies Ltd in the UK at all levels, including senior managers, officers, employees, consultants, trainees, homeworkers, part-time and fixed-term workers, casual workers, agency workers, volunteers, and interns (collectively '**Staff Members**').

6. This Policy should not be used for complaints relating to Staff Members' own personal circumstances, for example, complaints about the way they have been treated at work. In such cases, Staff Members should use Buzzers Academies Ltd's Grievance Procedure.

7. This Policy does not form part of any contract of employment, and the Employer may amend it at any time at its absolute discretion.

What Can be Reported Under This Whistleblowing Policy?

8. Whistleblowing is the disclosure of information that relates to suspected wrongdoing or dangers at work, as defined by the Public Interest Disclosure Act 1998 (the '**Act**'). To constitute whistleblowing, a disclosure must be a '**Qualifying Disclosure**' under the **Act** (i.e. the Staff Member must reasonably believe that the disclosure is in public interest and the disclosure must communicate that the alleged wrongdoing is happening, has happened, or will happen). Such disclosures may be disclosures about:
   a. Criminal activity;
   b. Miscarriages of justice;
   c. Danger to health and safety;

d. Damage to the environment;
e. Failure to comply with any legal obligation;
f. Bribery;
g. Financial fraud or mismanagement;
h. Breach of Buzzers Academies Ltd's internal policies and procedures including any Codes of Conduct;
i. Unauthorised disclosure of confidential information; or
j. The deliberate concealment of any of the above matters.

9. A whistleblower is a person who raises a genuine concern relating to any of the above. It is important to note that the **Act** only covers concerns raised by workers and employees.

10. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of Buzzers Academies Ltd's activities (i.e. a whistleblowing concern), you should report it following the procedures set out in this Policy.

11. If you are uncertain whether something is within the scope of this Policy, you should seek advice from the company Managing Director (Matt Walker).

How to Raise a Whistleblowing Concern

12. For a **Qualifying Disclosure** to constitute a '**Protected Disclosure**' (i.e. a disclosure within the scope of this Policy and covered by the law on whistleblowing) it must be made in the correct way. To ensure disclosures are made correctly, it is recommended that the steps within this section of the Policy are followed.

13. We hope that in many cases you will be able to raise any concerns with Buzzers Academies Ltd. Where possible, we ask that any concerns are raised with the company Managing Director (Matt Walker). You may tell them about your concerns in person or put the matter in writing. They may be able to agree with you on a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to another department within Buzzers Academies Ltd.

14. However, where the matter is more serious, or you feel that the company Managing Director has not addressed your concern, or you would prefer not to raise it with them for any reason, you should contact the person or department within Buzzers Academies Ltd responsible for the area of concern. For example:
a. If the concern relates to working conditions or terms and conditions of employment, please contact the company Operations Manager.
b. If the concern relates to health and safety matters, please contact the company HR & Office Manager.

Wider Disclosures

15. The aim of this Policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally (i.e. anyone outside of Buzzers Academies Ltd).

16. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body, for example, a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice (e.g. legal advice) before reporting a concern to anyone external.

17. Be aware that unique rules sometimes apply to determining when a Protected Disclosure can be made to an external party. For example, disclosures can be made to an external party if a Staff Member reasonably believes that the disclosure is substantially true, is

not acting for personal gain, and it is reasonable for them to make this disclosure in all the circumstances of the situation. You can contact the company Managing Director (Matt Walker) for more information on this.

How Buzzers Academies Ltd Will Respond to Disclosures

18. Once you have raised concern, it will be assessed to determine what initial action, or further investigation should be carried out. You will be advised:

a. Who is handling the matter;
b. How to contact them; and
c. Whether any further assistance will be needed from you (e.g. whether any further information is required).

19. You may be required to attend additional meetings in order to provide further information. You may bring a colleague or union representative to any such meetings. Your companion must respect the confidentiality of your disclosure and of any subsequent investigation.

20. All allegations will be investigated thoroughly. Depending on the complexity of the matter, it may take time to investigate. We will try to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation, its outcome, or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

21. If we conclude that a Staff Member has made false allegations maliciously or with a view to personal gain, the Staff Member may be subject to disciplinary action in accordance with our Disciplinary Procedure, which can be found online at: https://www.buzzersacademies.co.uk/policies.

22. We cannot always guarantee the outcome you seek. However, we will always deal with your concerns fairly and in an appropriate way.

Assurances

23. We are committed to this Policy. All staff should be able to voice concerns openly under this Policy. However, if you are concerned about reprisal because of raising concern under this Policy, we can take additional measures to preserve confidentiality.

24. The law on whistleblowing requires that Staff Members do not suffer any detrimental treatment because of raising a whistleblowing concern (i.e. a concern under this Policy), even if the Staff Member turns out to be mistaken in their claim. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. Buzzers Academies Ltd will always take care not to subject Staff Members to detrimental treatment when dealing with whistleblowing disclosures. However, if you believe that you have suffered any such treatment, you should inform the company Managing Director (Matt Walker) immediately to discuss resolution of the situation. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

25. Staff Members (e.g. managers) must not in any way threaten or retaliate against other Staff Members who have made whistleblowing disclosures. If you are involved in such conduct, you may be subject to disciplinary action.

This policy was reviewed and/or updated on 20/10/2026