

ZEN COMBAT ACADEMY LTD

WHISTLEBLOWING POLICY AND PROCEDURES

Speaking up about wrongdoing, protecting those who raise concerns,
and ensuring concerns are handled fairly and lawfully



Organisation	Zen Combat Academy Ltd
Policy title	Whistleblowing Policy and Procedures
Version	1.0
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Jurisdiction	England / Great Britain employment-law framework
Policy basis	Employment Rights Act 1996 (Part IVA), Public Interest Disclosure Act 1998, Employment Rights Act 2025 and current UK Government whistleblowing guidance

This is a Zen Combat Academy Ltd policy. It is separate from, but should be read alongside, the Academy safeguarding, complaints, disciplinary, equality, health and safety, data protection and code-of-conduct policies.

1. Purpose and commitment

Zen Combat Academy Ltd is committed to high standards of lawful, ethical, safe and accountable conduct. People must be able to raise genuine concerns about serious wrongdoing without fear of retaliation, victimisation or disadvantage.

This policy provides a clear route for workers and others connected with the Academy to speak up, explains how concerns will be handled, and distinguishes whistleblowing from personal grievances or routine complaints.

Core principle

A person who raises a genuine concern in the public interest should be listened to, treated fairly and protected from retaliation. A concern does not have to be proved before it is raised.

2. Scope

This policy is intended for employees, workers, coaches, instructors, assistant instructors, agency workers, contractors, trainees and others who work for or on behalf of Zen Combat Academy Ltd. The Academy also accepts concerns from volunteers, students, parents/carers, officials and members of the public, although the statutory whistleblowing protections in employment law do not necessarily apply to every category of person.

Nothing in this policy prevents any person from reporting a crime, safeguarding concern or immediate danger directly to the police, emergency services, local authority, regulator or other competent body.

3. Legal and Government framework

This policy is informed by the current Great Britain whistleblowing framework, including:

- Employment Rights Act 1996, Part IVA (protected disclosures) and section 47B protection from detriment;
- Public Interest Disclosure Act 1998, which established the statutory whistleblowing framework within the Employment Rights Act 1996;
- Employment Rights Act 2025, including the protection of qualifying disclosures relating to sexual harassment from 6 April 2026;
- Public Interest Disclosure (Prescribed Persons) framework, including the current Government list of prescribed people and bodies;
- Equality Act 2010 where concerns involve discrimination or sexual harassment;
- Data Protection Act 2018 and UK GDPR principles for confidential records and information sharing;
- relevant safeguarding, health and safety, fraud, criminal and regulatory duties where the subject matter of a disclosure engages them.

The statutory test for a protected disclosure depends on the facts and the route used. This policy does not replace independent legal advice and does not guarantee that every report will meet the legal definition of a protected disclosure.

4. What whistleblowing means

Whistleblowing is the reporting of information about wrongdoing that the person reasonably believes is in the public interest. For workers seeking statutory protection, the disclosure must meet the requirements of the Employment Rights Act 1996.

A qualifying disclosure may concern a past, current or likely future matter involving:

- a criminal offence, including fraud, theft, bribery or other unlawful conduct;
- a breach of a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any person;
- sexual harassment;
- damage to the environment; or
- deliberate concealment of information tending to show any of the above.

Within Zen Combat Academy Ltd, concerns that may also warrant use of this policy include serious safeguarding failures or concealment, falsification of qualifications or records, unsafe training practices, misuse of Academy funds, serious conflicts of interest, deliberate regulatory non-compliance, competition manipulation or improper betting activity connected with Academy events, and retaliation against someone who has raised a concern.

5. What is normally not whistleblowing

A concern that is purely personal and does not reasonably engage the public interest will normally be dealt with under another Academy procedure. Examples include:

- a disagreement about hours, pay, allocation of work or another individual employment issue;
- a routine complaint about service, membership or customer experience;
- a disagreement with a coaching decision, grading decision or selection decision where no wider wrongdoing is alleged;
- a complaint about another person's behaviour that is personal to the complainant and does not raise a wider public-interest issue.

Where a concern contains both a personal grievance and a public-interest issue, Zen Combat Academy Ltd may use more than one procedure. The person raising the concern will be told which route is being used where appropriate.

6. Safeguarding and immediate danger

Do not delay urgent action

If a child or adult is in immediate danger, a serious crime may be occurring, or urgent medical assistance is required, call 999. Safeguarding concerns must also be reported under the Academy Safeguarding Children or Safeguarding Adults Policy. Whistleblowing can be used where the concern is about wrongdoing, concealment, failure to act, or the way safeguarding is being handled.

7. Raising a concern internally

Concerns should be raised as soon as reasonably practicable. Early reporting can make it easier to protect people, preserve evidence and address wrongdoing.

1. Raise the concern with your line manager, lead instructor or a Director where that person is not implicated.
2. If the normal contact is involved in the concern, or you reasonably believe using that route would be inappropriate, raise it with another Director or senior person who is not implicated.
3. A concern may be made in writing, by email, by telephone or in person. Written reports are encouraged because they help create an accurate record.
4. For written reports, mark the communication "PRIVATE AND CONFIDENTIAL - WHISTLEBLOWING" and send it to Zen Combat Academy Ltd, Unit 1b Fletcher Industrial Estate, Bideford EX39 3EU, or email support@zencombatacademy.co.uk.
5. Where a concern relates to safeguarding, also follow the relevant safeguarding reporting route without waiting for the whistleblowing process.

The person raising the concern should provide as much factual information as they reasonably can, including what happened, dates, locations, people involved, witnesses, documents or other evidence, and whether anyone is at immediate risk. They are not expected to investigate the matter themselves or prove the allegation.

8. Confidential and anonymous reports

Zen Combat Academy Ltd will make reasonable efforts to protect the identity of a person who raises a concern confidentially. Confidentiality cannot be guaranteed absolutely because information may need to be shared to investigate properly, protect another person, comply with law, or enable a fair process. Information will be shared only where there is a legitimate need to know.

Anonymous reports will be considered. However, anonymity can make it harder to clarify evidence, assess credibility, provide feedback or take action. Where possible, a person is encouraged to provide a safe way for the Academy to contact them, even if they do not wish their identity to be widely known.

9. External disclosures and prescribed persons

A worker may in some circumstances make a disclosure outside the Academy and still receive statutory protection. The legal conditions can differ depending on who receives the disclosure. Government guidance identifies prescribed people and bodies for particular types of wrongdoing.

- Health and Safety Executive - for matters within its health and safety remit;
- Information Commissioner - for certain data-protection and information-rights matters;
- HM Revenue and Customs - for matters within its tax, National Insurance and customs remit;
- NSPCC - a prescribed body for specified child-welfare and protection matters;
- other prescribed regulators or bodies where the disclosure falls within their specified remit.

The current list of prescribed people and bodies is maintained on GOV.UK. A worker may also seek advice from a legal adviser, Acas, a trade union (where applicable) or an independent whistleblowing adviser before deciding how to proceed.

10. How Zen Combat Academy Ltd will handle a concern

When a whistleblowing concern is received, Zen Combat Academy Ltd will take the following steps, proportionate to the seriousness and nature of the matter:

1. Record the concern securely and acknowledge it where contact details are available.
2. Consider immediate safety, safeguarding, evidence-preservation and legal or regulatory issues before anything else.
3. Appoint an appropriate person to carry out an initial assessment. Anyone materially implicated in the concern must not control the assessment or investigation.
4. Decide whether the matter should be handled under this policy, another Academy procedure, referred externally, or handled through more than one route.
5. Where investigation is required, define the scope, gather relevant evidence, speak to appropriate people and keep an accurate record of decisions.
6. Take appropriate interim measures where necessary to protect people, evidence or the integrity of the process. Interim measures are not findings of guilt.
7. Where there is evidence of criminal conduct, safeguarding risk or another matter requiring statutory involvement, refer or report to the competent authority as appropriate.
8. Reach findings on the evidence available and decide any corrective, safeguarding, disciplinary, governance or referral action required.
9. Provide the person who raised the concern with appropriate feedback where possible, while respecting confidentiality, privacy and the rights of others.

11. Fairness and conflicts of interest

The person who is the subject of an allegation must be treated fairly. Whistleblowing is not a disciplinary finding. Where an allegation may lead to disciplinary action, the relevant disciplinary procedure and principles of fairness will apply.

A Director, manager, instructor or investigator with a personal interest, close relationship, prior involvement or other conflict that could reasonably affect impartiality must declare it and step away from decision-making where appropriate. Another suitable person, external adviser or authority may be appointed if needed.

12. Timescales

Zen Combat Academy Ltd will act without unreasonable delay. Exact timescales will depend on the complexity, safeguarding risk, availability of witnesses, external-agency involvement and any legal restrictions. The Academy will keep the person raising the concern informed at appropriate points where it can lawfully and fairly do so.

13. Protection from retaliation and victimisation

Zen Combat Academy Ltd will not tolerate retaliation, harassment, intimidation, victimisation or other disadvantage because a person has raised or assisted with a genuine concern. For workers, the Employment Rights Act 1996 provides statutory protection from detriment for qualifying protected disclosures, and dismissal because of a protected disclosure may be automatically unfair.

Examples of prohibited retaliation under this policy include threats, bullying, reducing opportunities, removing duties without proper reason, exclusion from training or work-related activity, adverse treatment, pressuring a person to withdraw a concern, or encouraging others to penalise them.

Anyone who believes they have suffered retaliation should report it immediately through this policy or to a Director not implicated in the matter. Retaliation may itself result in disciplinary or other action.

14. Good-faith mistakes and knowingly false allegations

A person will not be criticised or disciplined merely because a concern raised honestly turns out to be mistaken, unsubstantiated or not capable of proof. Whistleblowers are not required to be certain that wrongdoing has occurred.

However, knowingly fabricating evidence, deliberately making a false allegation, or maliciously using the procedure to harm another person may be dealt with under the Academy disciplinary or conduct procedures. A finding that a concern is not substantiated does not, by itself, show bad faith.

15. Record keeping, privacy and information sharing

- Whistleblowing records will be kept securely and separately from general records where appropriate.
- Records should distinguish fact, observation, allegation, opinion, decisions and actions taken.
- Personal information will be handled in accordance with applicable data-protection law and Academy privacy arrangements.
- Information will be shared only where necessary and proportionate for investigation, safeguarding, legal compliance or referral.
- Retention periods will reflect legal, safeguarding, employment, insurance and operational requirements.
- Where a matter is referred to police, local authority, regulator, insurer, legal adviser or another competent body, the Academy will preserve relevant records and cooperate as lawfully required.

16. Support

Raising a serious concern can be stressful. The Academy will seek to treat the person raising the concern respectfully and may signpost them to appropriate independent support or advice. This does not prevent the Academy from maintaining confidentiality or protecting the fairness of an investigation.

17. Roles and responsibilities

Directors and senior management are responsible for maintaining an open culture in which people can speak up, ensuring concerns are assessed appropriately, managing conflicts of interest and making external referrals where required.

Coaches, instructors, employees, contractors and volunteers must:

- raise serious concerns promptly rather than ignoring or concealing them;
- cooperate honestly with safeguarding, whistleblowing or other authorised investigations;
- preserve relevant evidence and records;
- maintain confidentiality and avoid gossip, retaliation or interference with witnesses;
- follow emergency, safeguarding and statutory reporting routes where applicable.

People with management responsibilities must not attempt to suppress a protected disclosure, require a worker to withdraw it, or use a confidentiality clause to prevent a lawful whistleblowing disclosure.

18. Relationship with other Academy policies

This policy should be read alongside, where relevant:

- Safeguarding Children Policy and Procedures;
- Safeguarding Adults Policy and Procedures;
- Safe Practice Policy and Procedures;
- Safeguarding Travel Policy and Procedures;
- Complaints Policy;
- Disciplinary and Conduct procedures;
- Equality, Diversity, Disability and Inclusion Policy;
- Health and Safety / risk-assessment arrangements;
- Data Protection and Privacy Policy;
- Social Media, Photography and Code of Conduct policies.

19. Training, awareness and culture

Zen Combat Academy Ltd will make this policy available to relevant personnel and will reinforce that safeguarding, safety, fraud, harassment and other serious wrongdoing should be raised rather than ignored. Managers and safeguarding personnel should understand how to receive concerns, protect confidentiality, avoid retaliation and escalate matters appropriately.

20. Monitoring and review

This policy will be reviewed at least annually and sooner where there is a significant change in law or Government guidance, a serious incident, learning from a case, a change to Academy structure or reporting arrangements, or another reason showing that revision is necessary.

The policy owner should periodically review themes arising from concerns, while protecting confidentiality, to identify improvements to governance, safeguarding, safety, training or culture.

Appendix A - Quick whistleblowing action flow

1. Is anyone in immediate danger?

YES: call 999 or obtain urgent medical assistance. If it is a safeguarding issue, also follow the Academy safeguarding procedure. NO: continue below.

2. Does the concern involve serious wrongdoing or a public-interest issue?

YES: use the whistleblowing route. If it is mainly a personal grievance, routine complaint or coaching disagreement, use the relevant Academy procedure unless a wider public-interest issue is also present.

3. Raise the concern

Contact a line manager, lead instructor or Director who is not implicated. If necessary, use another Director or an appropriate external prescribed person/body. Provide facts and evidence you already have - do not investigate the matter yourself.

4. Zen assesses immediate risk and conflicts

The Academy records the concern, considers safeguarding and safety, appoints an impartial person and decides whether internal investigation, another procedure, external referral or a combination is required.

5. Investigation / referral

Evidence is gathered proportionately. Criminal, safeguarding, regulatory or other statutory matters are referred to the competent authority when required. The whistleblower is protected from retaliation under this policy and, where the legal test is met, by law.

6. Outcome and learning

Appropriate action is taken. Feedback is provided where lawful and practicable. Records are secured and lessons are used to improve policy, safeguarding, safety, governance and culture.

Useful external information

GOV.UK whistleblowing guidance	www.gov.uk/whistleblowing
Prescribed persons list	GOV.UK - Whistleblowing: list of prescribed people and bodies
Acas	www.acas.org.uk / 0300 123 1100
Emergency services	999 where there is immediate danger or a serious incident requiring urgent police/medical response

Appendix B - Whistleblowing Concern Record

Complete this form as clearly as possible. You are not required to prove the concern. Record facts, dates, documents and witnesses where known. If there is immediate danger, contact emergency services first.

Name (optional if reporting anonymously)	
Role / connection to Zen Combat Academy Ltd	
Safe contact details	
Date concern raised	
Who received the concern	
Is anyone at immediate risk? If yes, state action taken	
Summary of concern	
Dates / locations / people involved	
Witnesses or supporting evidence	
Has the concern been reported elsewhere? If yes, to whom and when?	
Does the concern involve safeguarding, health & safety, crime, sexual harassment, fraud or another legal/regulatory issue?	

Reporter declaration (optional): I confirm that the information above is provided honestly and is accurate to the best of my knowledge and belief.

Signature	
Date	

Appendix C - Management Review and Action Record

OFFICE USE ONLY - To be completed by the person appointed to assess or manage the concern.

Reference number	
Date received / acknowledged	
Initial assessor / investigator	
Conflict-of-interest check completed	
Immediate safeguarding / safety action required	
Procedure(s) to be used	
External referral / advice (police, local authority, regulator, legal adviser, insurer, etc.)	
Investigation scope and key actions	
Outcome / findings	
Corrective / disciplinary / safeguarding / governance action	
Feedback provided to reporter (where appropriate)	
Record retention / closure date	

Approval and policy control

Approved by	Zen Combat Academy Ltd Management
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Next review	September 2027 or sooner if required
Signature	
Date	