



Whistleblowing Policy

APRIL WELL LIMITED — Company No. 11924473

Registered office: Unit 39c St Olavs Court Business Center, Lower Road, London, England, SE16 2XB

Director / Legal Representative: Xiaoying Chi

Designated Safeguarding Lead (DSL): Xiaoying Chi

(Deputy DSL: n/a – temporarily covered by the DSL)

24/7 emergency: 07930416543

Email: info@aprilwell.co.uk

This policy is publicly available. It may be shared with parents, agents, partner schools and inspectors on request.

Document Control

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This document is reviewed annually in December and whenever statutory guidance or AEGIS Standards change.

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Policy Statement

April Well Limited is committed to the highest standards of transparency, integrity and accountability in its work as an education guardianship organisation for international students. Concerns about poor practice within April Well Limited should usually be dealt with through the April Well Limited Complaints Procedure, which is available on our website at <https://aprilwell.co.uk/policy>. However, serious allegations may be raised by following this whistleblowing policy.

It is the duty of all staff members of April Well Limited and those associated with April Well Limited to raise any concerns so that improvements can be made. Raising concerns in the reasonable belief that it is in the public interest to do so will not result in reprisals in any form.

This policy is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations, where they reasonably believe that it is in the public interest to do so, from being victimised, discriminated against or otherwise disadvantaged. This policy does not replace other policies and procedures such as the April Well Limited Complaints Procedure or the Safeguarding and Child Protection Policy.

This procedure applies to all April Well Limited employees and also includes associates, contractors and partner schools who work with us. If an employee has a concern about the conduct of a fellow employee in the working environment (for example, that they are not treating colleagues with respect), they should raise this with their line manager or, if that is not possible or appropriate, with the Director.

Policy

This procedure applies to, but is not limited to, allegations about any of the following:

- Conduct which is an offence or breach of the law
- Alleged miscarriage of justice
- Serious Health and Safety risks
- The unauthorised use of public funds
- Possible fraud and corruption
- Sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or service users
- Abuse of authority

- Concerns about how child protection issues are being handled in the organisation
- Other unethical conduct

Reporting

April Well Limited recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty to those for whom April Well Limited is providing a service (international students). April Well Limited will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

Confidentiality

All allegations will be treated in confidence, and every effort will be made not to reveal a whistleblower's identity unless requested by the whistleblower. April Well Limited will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation. Sometimes the whistleblower might be asked to give a statement as part of the investigation, in which case their identity may have to be revealed.

Anonymous allegations

This policy encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the Director. In exercising discretion to accept an anonymous allegation the factors to be taken into account are:

- The seriousness of the issue raised
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

Untrue allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

Procedure for making an allegation

It is preferable for allegations to be made to, for example, an employee's immediate manager to whom they report. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if the whistleblower believes that management is involved it would be inappropriate to raise it directly with them. The whistleblower may then make an allegation direct to any of the following:

- The NSPCC whistleblowing helpline. Telephone number 0800 028 0285 between 8am and 8pm Monday to Friday or email help@nspcc.org.uk
- Protect provide a free, confidential advice line for concerned staff to call before whistleblowing. The helpline is 020 3117 2520 and their website is: www.protect-advice.org.uk
- AEGIS Telephone number 01453 821 293 or email yasemin@aegisuk.net

Allegation

Whether a written or oral report is made it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation.

Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

Action on receipt of an allegation

The line manager will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- The record of the allegation;
- The acknowledgement of the allegation;
- Any documents supplied by the whistleblower.

The investigator will ask the whistleblower for their preferred means of communication and contact details and use these for all communications with the whistleblower in order to preserve confidentiality.

If the allegation relates to fraud, potential fraud or other financial irregularity the Director will be informed within 5 working days of receipt of the allegation. The *Director* will determine whether the allegation should be investigated and the method of investigation.

If the allegation discloses evidence of a criminal offence, it will immediately be reported to the *Director* and a decision will be made as to whether to inform the Police or appropriate authorities.

Timetable

An acknowledgement of the allegation will be made in writing within 10 working days with:

- An indication of how April Well Limited proposes to deal with the matter.
- An estimate of how long it will take to provide a final response.
- An indication of whether any initial enquiries have been made.
- Information on whistleblower support mechanisms.
- An indication whether further investigations will take place and if not, why not.

Where the allegation has been made internally and anonymously, obviously April Well Limited will be unable to communicate what action has been taken.

Support

April Well Limited will take steps to minimise any difficulties which may be experienced as a result of making an allegation. For instance, if a whistleblower is required to give evidence in criminal or disciplinary proceedings April Well Limited will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available.

April Well Limited accepts that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

Responsibility for the procedure

The Director has overall responsibility for the operation of this procedure and for determining the administrative processes to be followed and the format of the records to be kept.

Monitoring

A Register will record the following details:

- The name and status (e.g. employee) of the whistleblower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the Director.

Further information and advice can be found here: [Whistleblowing for employees: What is a whistleblower - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/whistleblowing-for-employees-what-is-a-whistleblower)

Contact details

In the first instance, concerns under this Whistleblowing Policy may be raised with:

Name: Xiaoying Chi

Role: Director and Designated Safeguarding Lead (DSL)

Telephone: +44 (0)7930 416543

Email: info@aprilwell.co.uk

Postal address: April Well Limited, Unit 39c, St Olavs Court Business Center, Lower Road, London, SE16 2XB

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 04/12/2025

Signed:

A handwritten signature in black ink, appearing to be "Xiaoying Chi".

Name: Xiaoying Chi

Role: Director and Designated Safeguarding Lead (DSL)

Date: 04/12/2025