



Whistleblowing Policy

1. Purpose

It is vital that everyone who works for BGCI maintains the highest standards of conduct, integrity and ethics, and complies with local legislation. If an employee, volunteer, partner, consultant or contractor has any genuine concerns about malpractice in the workplace, they are required to communicate and raise concerns without fear of reprisals and in the knowledge they will be protected from victimisation and dismissal. This policy sets out how individuals can raise concerns and how those concerns will be dealt with.

This policy does not form part of an employees' terms and conditions of employment and may be subject to change at the discretion of the Senior Management Team.

2. Scope

Malpractice in the workplace includes (but is not limited to) the following:

- financial wrongdoing including theft, bribery, fraud and money laundering
- failures to comply with legal obligations
- criminal offences
- miscarriage of justice
- abuse of position
- danger to the health and safety of individuals
- damage to the environment
- improper conduct or unethical behaviour
- activity which would bring the organisation into serious disrepute
- sexual misconduct including sexual abuse, harassment or exploitation
- abuse or exploitation of children and vulnerable adults
- the deliberate concealment of information relating to any of the matters listed above

If you have a genuine concern and have a reasonable belief it is in the public interest, even if it is later discovered that you are mistaken, under this policy you will not be at risk of losing your job or from suffering any form of retribution as a result.

This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice. Those found to be making false allegations maliciously will have disciplinary action taken against them.

Malpractice is not a complaint about the performance and behaviour of a manager or other work colleague towards you. Such complaints should be directed for action to BGCI HR policies and procedures. Nor does this policy intend to replace grievance procedures which continue to be the appropriate way to raise personal issues relating to your employment.

3. Raising concerns

If you genuinely believe that the actions of someone who works for BGCI could lead to or has resulted in malpractice, please raise the concern as follows:

Stage 1:

In the first instance, any concerns should be raised with the Secretary General who will arrange an investigation of the matter. The investigation may involve you and other individuals involved giving a written statement. At the point of raising a concern it would be useful for you to share information describing:

- Whether anyone is at immediate risk of harm?
- What happened? If possible, make note of dates, times, places, people.
- Who is involved?
- How do you know about it?
- When were you first concerned about it?
- Have you told anybody about it?
- Was any action taken?

Your statement will be taken into account, and you will be asked to comment on any additional evidence obtained. The Secretary General will take any necessary action, including reporting the matter to the Chair of the Board of Trustees and any appropriate government department or regulatory agency. The Secretary General will also invoke any disciplinary action required. On conclusion of any investigation, you will be notified of the outcomes, which are subject to confidentiality and may not be communicated.

Stage 2:

If you are concerned that the Secretary General is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the relevant person, you should escalate the matter to the Chair of the Board of Trustees. The Chair will arrange for a review of the investigation to be carried out, make any necessary enquiries and make their own report to the Board.

Stage 3:

If on conclusion of stages 1 and 2 you reasonably believe that the appropriate action has not been taken, you should report the matter to the relevant body. This includes:

- HM Revenue & Customs
- The Health and Safety Executive
- The Environment Agency
- The Serious Fraud Office
- The Charity Commission
- The Pensions Regulator
- The Information Commissioner
- The Financial Conduct Authority

4. Data protection

All data and information about the concern shall be processed in accordance with the BGCI Data Protection Policy.

5. Confidentiality

Confidentiality will be maintained at all stages of dealing with the concerns to protect the integrity of the investigation, and to preserve evidence. Information relating to the concern will be shared on a need-to-know basis only and will always be kept secure.

6. Policy implementation and review

This policy and its implementation will be reviewed regularly, including in the event of changes to legislation and good practice.

7. Law and guidance supporting this policy

This policy has been drawn up based on law and guidance, namely:

- Employment Rights Act (1996)
- Public Interest Disclosure Act (1998)

8. Associated policies and procedures

- BGCI Anti-Harassment and Bullying Policy
- BGCI Code of Conduct
- BGCI Data Protection Policy
- BGCI Safeguarding Children and Vulnerable Adults Policy
- BGCI Whistleblowing Policy

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