



Bethnal Green Nature Reserve Trust

Whistleblowing Policy

Last Updated: 1 May 2024

ABOUT THIS POLICY

The Bethnal Green Nature Reserve Trust (the **Trust**) are committed to conducting their work fairly, honestly and with transparency and in compliance with all legal and regulatory obligations. We expect all the Trust's Trustees, staff, volunteers, collaborators, and anyone acting on our behalf to do the same and to maintain the highest standards of ethical behaviour.

However, all organisations face the risk of things going wrong from time to time. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur. A key aspect of ensuring and maintaining the Trust commitment to conducting our work with such integrity and in an open and fair manner is providing a robust whistleblowing policy and reporting channel for the Trust so that all colleagues feel able to report any wrongdoing in confidence.

This policy provides an overview of the whistleblowing process, including the protections that will be afforded to whistleblowers.

What is a whistleblower?

You're a whistleblower if you're a worker and you report certain types of wrongdoing. This will usually be something you've seen at work – though not always. The wrongdoing you disclose must be in the public interest.

Whether it is in the public interest will depend on:

- the number of people affected
- the nature and impact of the wrongdoing
- who the wrongdoer is

Generally, this means that the concern must have an impact that is wider than one employee's personal circumstances. As a whistleblower you are protected by law. You should not be treated unfairly or lose your job because you 'blow the whistle'.

A whistleblowing policy is a set of guidelines and procedures established by an organisation to encourage employees to report unethical or illegal activities within the organisation. The policy is designed to protect whistleblowers from retaliation and to ensure that the information they provide is properly investigated.

Concerns that count as whistleblowing

You may be protected by law if you report any of the following:

- a criminal offence, for example fraud or someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice the company is breaking the law – for example, it does not have the right insurance
- you believe someone is covering up wrongdoing

We encourage staff to report any concerns as soon as they arise; such concerns can be of any nature, including any matters in connection with the Trust personnel, as well as visitors, suppliers and other third parties.

The aim of this policy therefore is to:

- Encourage and empower colleagues to speak up and report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- Provide colleagues with guidance as to how to raise those concerns.
- Reassure colleagues that they will be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- Encourage a culture of openness.
- Ensure compliance for the Trust with the relevant legislation.

This is not a policy to be used in order to question the Trust's financial decisions or business strategy, nor should it be used to raise matters which would normally be considered under an HR grievance procedure (for example harassment, bullying or discrimination) or are already the subject of a disciplinary procedure. The below sets out in more detail what type of behaviour this policy covers and what should be reported pursuant to this policy.

Scope

This policy applies to all the Trust's Senior Management, Trustees, freelancers, collaborators, contractors (all referred to as staff for the rest of the document) and volunteers, no matter which team they work in.

It relates to actions by such personnel as well as any concerns a colleague may have with one of the Trust's visitors, suppliers or any other third parties with which the Trust interacts or does business.

What type of misconduct should be reported?

As noted above, we want to hear about such conduct that is unlawful, dishonest or unethical as soon as possible and is committed to addressing it. The below provides examples of the types of

misconduct or behaviour that could give rise to a report; however, it is not an exhaustive list and we encourage all colleagues to report any behaviour or incidents which they have concerns about.

- Actions which cause damage to the environment.
- Actions which endanger the health and safety of the Trust personnel or the public.
- Failure to comply with any legal or professional obligation or regulatory requirements.
- Criminal activity or offences, including fraud, theft, and embezzlement.
- Corruption, bribery, or blackmail.
- Financial malpractice, impropriety, or mismanagement.
- Facilitating tax evasion.
- Conduct likely to damage the Trust's reputation or financial wellbeing.
- The deliberate provision of false information to public officers.
- A miscarriage of justice.
- Unauthorised disclosure of confidential information.
- The deliberate concealment of information relating to any of the above matters.
- Any retaliation against someone for speaking up or "whistleblowing".

Everyone has a responsibility to report any such misconduct or potential misconduct as soon as they become aware of it. If you are uncertain whether something is within scope of this policy, it is preferable that any concerns are reported rather than kept to oneself.

The Trust has separate Adult and Child Safeguarding Policies which contain a process for reporting concerns if you believe somebody within the organisation is abusing a child or vulnerable adult. The process in those Policies should be followed where relevant but somebody reporting internal instances of abuse would be considered a whistleblower and the legal protections explained in this policy would apply.

How to report a concern - all colleagues

All of the options below include escalation to members of staff who are fully trained in whistleblowing reporting and procedures. Irrespective of the option exercised therefore, the whistleblowing procedures the Trust has in place ensure that you will be taken through and will fully understand the overall process and next steps.

Option 1 – Internal Report

Any reports should be made to Senior Site Manager (info@bethnalgreennaturereserve.org) or the Chair of the Trust (Sajida Malik – trustees@bethnalgreennaturereerve.org) in the first instance for further investigation. This may be done either verbally or in writing. Your concern may be escalated to appropriate parties, on the condition that your concern does not implicate such parties. A decision will then be taken as to who is best placed to investigate and resolve the matter.

Option 2 – Safecall

If the option of reporting to either of the people identified in Option 1 is not feasible, is inappropriate or you feel uncomfortable in doing so for any reason (including if you have concerns about their involvement), or the response received is unsatisfactory, you can report your concern

using Safecall. You can make a report by freephone: **UK 0800 915 1571 HK 3077 5524** or www.safecall.co.uk/report.

This service is available twenty-four (24) hours a day and seven (7) days a week. Reports may also be made anonymously to Safecall, in which case the Trust will not find out the identity of the person who raised the concern.

Whom will Safecall notify?

Safecall will inform a nominated appropriate party that a report has been received. If the allegations relate to a nominated appropriate party, Safecall will notify a reserve. To the extent that reports relate to all nominated appropriate parties Safecall will inform the Chairperson of the Board of Trustees. A decision will then be taken as to who is best placed to investigate and resolve the matter. Safecall will only reveal the identity of a reporter if they give their consent.

What will the trust do about concerns that are raised?

Once you have raised a concern, the person to whom you raised the concern will take a decision as to who is best placed to investigate the matter.

We will endeavour to keep you informed of the progress of the investigation. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

As explained below, all genuine complainants will be protected against retaliation but if we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action, which may involve suspension or termination of their role.

Reporting concerns externally – exception cases only

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. However, we recognise that there may be circumstances where staff may feel they wish to report matters to outside bodies such as a regulator or the police.

It will very rarely be appropriate to alert the media without some internal consultation and dialogue. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a volunteer, contractor or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact one of the individuals set out above for guidance.

Protection against retaliation

We will ensure that genuine concerns raised of a reasonable belief can be raised without fear of retaliation and will not affect the continued employment, work, or career with the Trust of the

person who raised their concerns. We will not tolerate harassment, victimisation, or retaliation towards any person for raising concerns on the basis of a reasonable belief or objecting or refusing to participate in any act or practice that they honestly believe to be in violation of law or misconduct. Any such harassment, victimisation or retaliation will be treated as very serious and will be a disciplinary offence in accordance with the Trust's procedures.

Confidential and anonymous reporting

All reports will be handled in complete confidence and the identity of the individual reporting the issue will be kept confidential and only disclosed to those who need to know it for purposes of any investigation. As noted above, reports may also be made anonymously to Safecall, in which case the Trust will not find out the identity of the person who raised the concern.

Please note that it is more difficult for an issue to be investigated, to protect the individual reporting the issue or to give them feedback, if the individual cannot be identified. An investigation stands a much greater chance of success if the person who raised the concern remains in communication via the Safecall portal or by telephone. Even if they choose to remain anonymous, it is still possible and desirable to establish a channel of communication.

Reporting Pathways

Senior Site Manager – Michael Smythe: info@bethnalgreennaturereserve.org

BGNRT Chair – Sajida Malik: Trustees@bethnalgreennaturereserve.org

Safecall – UK: 0800 915 1571 or www.safecall.co.uk/report

This policy will be reviewed on an ongoing basis, at least once a year. The Trust will amend this policy, following review, where appropriate.