

# BCI WHISTLEBLOWING POLICY

Title:	<b>BCI Whistleblowing Policy</b>	Version:	<b>1.0</b>
Department:	<b>HR</b>	Effective Date:	<b>02/21</b>
Owner:	<b>Fanny Udin</b>	Review Date:	<b>11/20</b>
Approver:	<b>Alan McClay</b>	Approval Date:	<b>02/02/21</b>
Audience:	<b>All BCI Personnel</b>		

## 1. Purpose and Scope

As an organisation, BCI is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards of work at all times. Any suspected wrongdoing must be reported as soon as possible.

This document sets out the steps that must be taken where any wrongdoing is suspected or discovered. It also provides a framework for protecting the confidentiality of those reporting such activities.

This policy is not contractual. It does not form part of terms and conditions of employment or engagement. BCI reserves the right to make changes to this policy or replace this policy (for any reason) at any time. BCI also reserves the right to depart from this procedure/policy, including any time limits, as appropriate in any case.

## 2. Definition

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to BCI's activities.

This can include bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

## 3. BCI Values

Officers, Directors, staff, consultants, vendors and interns hereafter referred to as Staff Members are expected to lead by example and embrace the BCI values and adhere to all relevant policies and practices in their dealings with internal and external stakeholders. The BCI values are:

- **Trustworthy** (including honest, transparent, credible)
- As having **Integrity** (including responsible, authentic)
- **Positive** (including problem-solving, pragmatic)
- **Engaging** (including adaptable, inclusive, holistic)
- **Daring** (including courageous, innovative, game-changing)

Equally, service users and contracted external organisations (such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against BCI in any dealings they may have with BCI.

BCI provides clear routes by which concerns can be raised by Officers, Directors, staff, consultants and interns and by those outside of the organisation. A copy of this Policy is available to all in the BCI Policies folder. It is shared with staff when they join.

BCI is expected to deal promptly, firmly and fairly with suspicions and allegations of fraud or corrupt practice. Please refer to BCI Anti-Corruption Policy for details on the BCI position regarding bribery, and corruption and the BCI Fraud Prevention Policy for more details on Fraud.

## 4. Reporting a Concern

Staff Members should act in good faith (without malice or consideration of personal benefit) and shall not make false accusations when reporting a wrongdoing. Staff Members must not attempt to investigate the concern themselves.

BCI encourages individuals to raise any concerns with their immediate Line Manager, or their contact person at BCI. However, where this, for any reason, is not the preferred route, those affected should contact either the Whistleblowing Officer, the Whistleblowing Executive or the BCI Board liaison, or submit the completed Concern form at [whistleblowing@bettercotton.org](mailto:whistleblowing@bettercotton.org). Concerns may be raised directly with the BCI Council. Contact details can be found at the end of this policy.

Following on from the report, the BCI Whistleblowing Committee will review the concern(s) raised and a meeting with the individual will be arranged as soon as possible to discuss the concerns. Those raising concerns may bring a colleague or third party to any meetings arranged under this policy. Any such colleague or third party must respect the confidentiality of the disclosure and any subsequent investigation into it.

## 5. The Investigation

Any reported concern will be investigated promptly. Such an investigation may include: individual interviews with the party involved, and where necessary, with individuals who may have observed the activity or may have other relevant knowledge and depending on the seriousness of the claim police involvement or the appointment of an external investigator. An Investigation team may be set up from times to times with the purpose of investigating a specific concern. Nominated team members will stop participating if a conflict of interest is discovered during the investigation.

## 6. Confidentiality

BCI is trying to create an environment in which staff or others involved with the organisation feel able to voice whistleblowing concerns openly under this policy as it is difficult to investigate completely anonymously. If concerns are raised, BCI will make every effort to keep the identity of those raising those concerns confidential and to only reveal it where necessary to those involved in investigating the concerns, or to other third parties, where BCI believes there is a legal or regulatory obligation to do so.

## 7. Supporting and Protecting Whistleblowers

BCI encourages openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. Anyone believing that they have suffered any such treatment, should inform one of the parties listed below immediately. If the matter is not remedied, the individual should raise it formally using BCI's Grievance Procedure.

No one should threaten or retaliate against whistleblowers in any way. Any such conduct may render the person responsible to disciplinary action.

However, if BCI concludes that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

## 8. List of Contacts

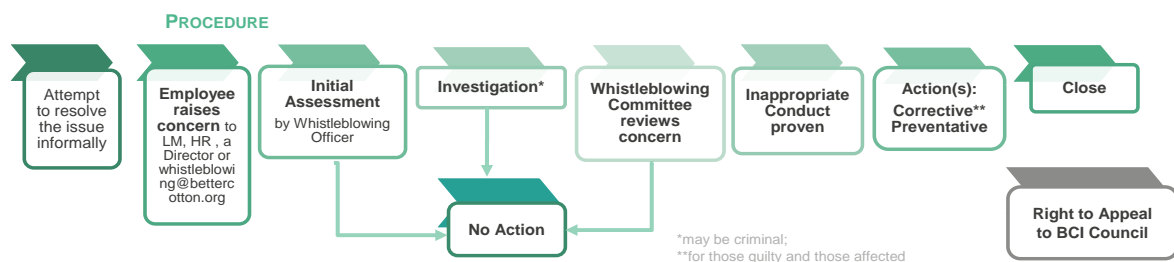
<b>BCI Whistleblowing email</b>	Whistleblowing@bettercotton.org
<b>BCI Whistleblowing Officer</b>	Fanny Udin
<b>BCI Whistleblowing Executive</b>	Lena Staafgard
<b>BCI Board's Liaison</b>	Alan McClay
<b>Public Concern at Work</b> (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a> Website: <a href="http://Protect - Speak up stop harm (protect-advice.org.uk)">Protect - Speak up stop harm (protect-advice.org.uk)</a>

## 9. Review

The BCI Executive Group is responsible for reviewing the policy on a regular basis.

## Appendices

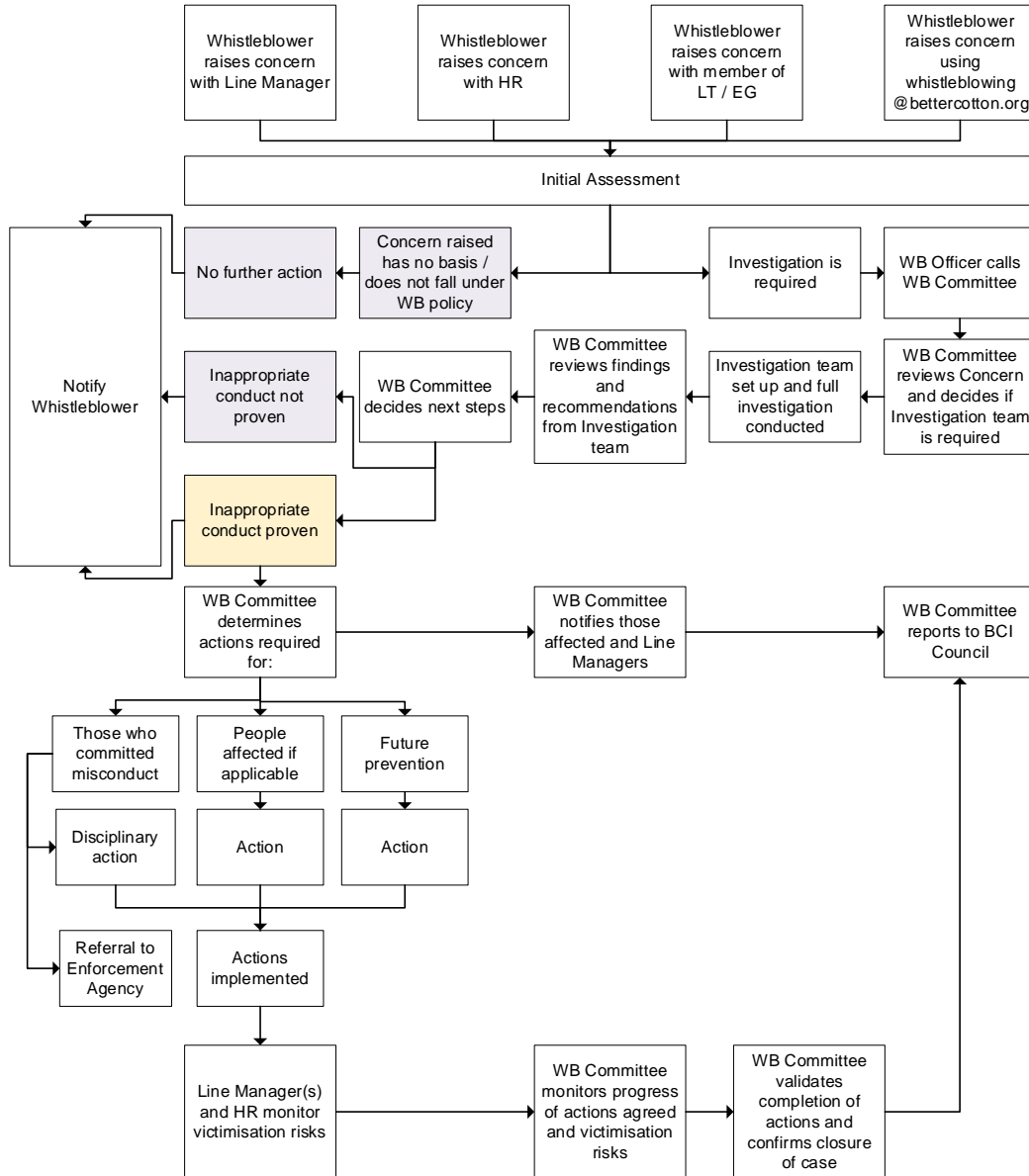
### 1. Whistleblowing Flowchart 1



## 2. Whistleblowing Flowchart 2

### BCI HR Policies – Whistleblowing

Owner: Fanny Udin  
Version: 1.0



### Escalation routes

