

## WHISTLE-BLOWING POLICY 2023-2024

**1. WHISTLE-BLOWING is where an employee or volunteer raises concerns about underhand or illegal practices within an organisation. This could include Gazen Salts Nature Reserve's fundraising activities, in accordance with the Code of Fundraising Practice.**

1.2 Gazen Salts Nature Reserve at all times conducts its business with the highest standards of integrity and honesty. It expects all trustees/volunteers to maintain the same standards in everything they do. Trustees/volunteers are therefore encouraged to report any actions by trustees or volunteers and those of any third party they believe fall short of these principles.

1.3 Gazen Salts Nature Reserve is committed to maintaining an open culture with the highest standards of honesty and accountability where any legitimate concerns can be reported in confidence. All cases of malpractice will be taken seriously.

1.4 Gazen Salts Nature Reserve will not treat an individual detrimentally if they honestly and reasonably believe that underhand or illegal practices are taking place, and will protect them from victimisation, harassment or bullying occasioned as a result of the disclosure.

1.5 Gazen Salts Nature Reserve recognises that trustees and/or volunteers may not always feel comfortable about discussing their concerns internally, especially if they believe that senior individuals are responsible for the wrongdoing. The aim of this policy is to ensure that trustees and volunteers are confident that they can raise any matter with the Chair that concerns them in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them.

1.6 Where trustees and/or volunteers have concerns or questions relating to any of the following, they should report their concerns immediately to the Chair:

- A criminal offence
- A failure to comply with a legal obligation
- A miscarriage of justice
- Danger to health and safety
- Danger to the environment
- Breach of contract
- Negligence
- Financial conduct of Gazen Salts Nature Reserve or any of its volunteers
- Concerns regarding safeguarding children or vulnerable adults
- Deliberate concealment of information relating to the above
- Actions which adversely affect Gazen Salts Nature Reserve's reputation

1.7 If a trustee/volunteer fails to notify the Chair of any of the above it may be regarded as misconduct.

1.8 In certain circumstances where a trustee/volunteer is concerned about wrongdoings or failures they can make disclosures externally to certain prescribed persons or bodies.

1.9 However if a trustee/volunteer does this without notifying the Chair first without good reason it may be considered misconduct – if the Chair is unaware of an issue s/he is unable to act expediently. Therefore a trustee/volunteer should follow the procedures under this policy in the first instance.

1.10 The Chair will keep a record of all complaints and report to the Board of Trustees. Any complaints relating to fundraising would be reported to the Fundraising Regulator.

## 2 PROCEDURES

2.1 Volunteers/trustees should report matters to the Chair

2.2 Any information provided under this procedure, including the fact that a concern has been raised with the Chair, will remain confidential between the individual, the person with whom it was first raised and the person investigating it. However, depending on the nature of the matter raised, the Chair may be required by law to disclose some or all of the information to a third party, in which case the individual will be informed.

2.3 If the matter requires further investigation, such an investigation will be carried out and the individual will be informed of the outcome of the investigation and what, if any, action has been taken.

2.4 Gazen Salts Nature Reserve undertakes that no trustee or volunteer who makes a bona fide report under this procedure will be subjected to any detriment as a result.

2.5 Gazen Salts Nature Reserve is keen to hear of any concerns that trustees or volunteers may have about wrongdoing and encourages them to use the procedure described in this document wherever possible.

2.6 Gazen Salts Nature Reserve recognises that there may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is necessary the Chair reserves the right to make such a referral without the trustee's or volunteer's consent.

2.7 If the trustee or volunteer feels that the matter has not been properly investigated by the Chair, there are various external organisations with whom they may raise their concerns. Examples of these organisations are:

- Whistleblowing Commission - Public Concern at Work
- Health and Safety Executive
- HMRC
- Fundraising Regulator
- Charity Commission

2.8 Under the Public Interest Disclosure Act 1998, disclosures to persons outside Gazen Salts Nature Reserve should only be made if the trustee or volunteer honestly and reasonably believes the allegation to be true.

Signed *Daniel Friend* (Chair of Trustees, Gazen Salts Nature Reserve)

Date 4 November 2023

**To be reviewed October 2024**