

## WHISTLEBLOWING POLICY

### 1. INTRODUCTION

At REACT, we aim to conduct our work to the highest standards of honesty and integrity at all times, and we expect all our workforce to maintain the same standards in everything they do. All those who work with us are therefore strongly encouraged to report any wrongdoing, whether real or perceived, by the organisation or its employees, volunteers, contractors, or consultants who fall short of these principles. Concerns raised in good faith will always be treated fairly whether the matter turns out to be true or not.

### 2. POLICY

It is important that any fraud, misconduct, sexual harassment or other wrongdoing by staff or others working on behalf of the charity is reported and properly dealt with. We therefore require all individuals to raise any concerns that they may have about the conduct of others in the charity or the way in which the organisation is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

### 3. BACKGROUND

The Public Interest Disclosure Act 1998 amended the Employment Rights Acts 1996 (and as amended 2025) to provide protection for workers who raise legitimate concerns about specified matters in the public interest. These are called 'qualifying disclosures'. A qualifying disclosure is one made by an employee who has a reasonable belief that:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety of people involved in or affected by the actions of the organisation.
- an act causing damage to the environment.
- sexual harassment
- a breach of any other legal obligation
- or concealment of any of the above

is being, has been, or is likely to be, committed. It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. You have no responsibility for investigating the matter – it is the organisation's responsibility to ensure that an investigation takes place.

If you make a protected disclosure, you have the right not to be dismissed, subjected to any other detriment, or victimised, because you have made a disclosure. We encourage you to raise your concerns under this procedure in the first instance.

## 4. PRINCIPLES

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff and others working on behalf of the organisation should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this policy and procedure will be investigated thoroughly, promptly, and confidentially, and the outcome of the investigation reported back to the person who raised the issue.
- No employee or other person working on behalf of the organisation will be victimised for raising a matter under these arrangements. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because they have raised a legitimate concern.
- Victimisation of an individual for raising a qualified disclosure will be managed as a disciplinary offence.
- If misconduct is discovered because of any investigation under this policy and procedure, our disciplinary procedure will be used, in addition to any appropriate external measures.
- Making false and malicious allegations is a disciplinary offence.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent. You should report the matter to the chief executive or the chair of the board of trustees.

## 5. PROCEDURE

This procedure is for disclosures about matters other than a breach of your own contract of employment. Matters relating to your contract of employment, should be raised via the grievance procedure.

**Stage 1:** In the first instance, any concerns should be raised with the Director of People & Resources, who will arrange an investigation of the matter. The investigation may be carried out by an independent investigator; it will involve you and other individuals involved giving a written statement and possibly an interview. Any investigation will be carried out in accordance with the principles set out above.

Your statement will be considered, and you will be asked to comment on any additional evidence obtained. The Director of People & Resources 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 Director of People & Resources will also initiate any disciplinary action required. On conclusion of any investigation, you will be told the outcome and what the organisation has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

**Stage 2:** You should escalate the matter to the chair of the board of trustee if you are concerned that the Director of People & Resources:

- 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.

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 relevant local Police Force
- The Environment Agency
- The Serious Fraud Office
- The Charity Commission
- The Pensions Regulator
- The Information Commissioner
- The Financial Conduct Authority
- The Competition and Markets Authority
- The Independent Office for Police Conduct

You can find the full list in [The Public Interest Disclosure \(Prescribed Persons\) Order 2014 \(PDF\)](#).

## 6. DATA PROTECTION

When an individual makes a disclosure, we will process any personal data collected in accordance with the data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

## 7. POLICY REVIEW

This policy will be reviewed annually, or more frequently if required, for example where there is a breach or changes made to relevant UK legislation. The review will ensure the policy remains up to date as well as assessing the effectiveness of how the policy is working in practice and taking action to address any identified issues.

**Date: January 2026**

**Next review: January 2027**