WHISTLEBLOWING POLICY

For trustees, employees and everyone connected with BOS UK

Document Control	Details
Policy owner	Board of Trustees
Operational lead	Chief Executive Officer
Approved by	Board of Trustees
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Effective from	28 August 2026
Next review	12 months after approval, or sooner following a material change

1. Purpose

Borneo Orangutan Survival UK ("BOS UK" or "the Charity") is committed to operating honestly, responsibly, and in accordance with the law, its charitable purposes, and its values. BOS UK encourages anyone connected with the Charity to speak up if they reasonably believe that serious wrongdoing has occurred, is occurring, or is likely to occur.

This policy provides safe and accessible routes for raising concerns, supports fair and prompt investigation, protects those who speak up from retaliation and reprisal, and helps the trustees discharge their legal and regulatory responsibilities. No person should feel that they must remain silent about serious wrongdoing.

2. Scope

This policy applies to:

- employees, workers and agency workers;
- consultants, contractors, interns and secondees;
- volunteers and trustees;
- beneficiaries and partners;
- former employees and workers;
- job applicants, where relevant; and
- other individuals working with or on behalf of BOS UK.

Employees and workers may have statutory protection under the Employment Rights Act 1996 and the Public Interest Disclosure Act 1998. Volunteers, trustees and genuinely self-employed contractors may not receive the same statutory protection. Nevertheless, BOS UK encourages them to use this policy and will seek to protect anyone who raises a genuine concern from retaliation or unfair treatment.

This policy is non-contractual and may be amended by the Board of Trustees.

3. WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information that a person reasonably believes shows serious wrongdoing affecting, or potentially affecting, other people or the wider public interest. A concern may relate to conduct that has occurred, is occurring, is likely to occur, or is being deliberately concealed.

Examples include:

- a criminal offence, including fraud, theft, bribery, corruption, money laundering or terrorist financing;
- financial mismanagement, misuse of charitable funds or other serious financial irregularity;
- failure to comply with a legal, regulatory or professional obligation;
- danger to the health or safety of any person;
- safeguarding failures or the abuse, exploitation or neglect of a child or adult at risk;
- sexual harassment;
- serious bullying, harassment or discrimination where there is a wider public-interest dimension;
- damage, or risk of damage, to the rainforest ecosystem;
- animal cruelty, serious animal-welfare failures or the deliberate concealment of such conduct;
- serious breaches of conservation, wildlife-protection, trade or environmental requirements;
- serious misconduct involving a partner, supplier, contractor or organisation funded by BOS UK;
- misuse of personal data or serious breaches of data-protection or cybersecurity requirements;
- conduct threatening the Charity's assets, beneficiaries, charitable purposes or reputation;
- undisclosed or improperly managed conflicts of interest or private benefit;
- a miscarriage of justice; or
- deliberate concealment, destruction or falsification of evidence relating to any of the above.

This list is illustrative and not exhaustive.

4. MATTERS COVERED BY OTHER PROCEDURES

A personal complaint relating only to an individual's own employment or treatment will not normally constitute whistleblowing unless it also raises a wider public-interest concern. Personal employment complaints should normally be raised under the Charity's Grievance Policy. Bullying, harassment, discrimination or safeguarding complaints may also fall under the relevant BOS UK policy.

If it is unclear which procedure applies, BOS UK will determine the most appropriate process. A concern will not be disregarded merely because it was initially raised under the wrong procedure. This policy should not be used simply to challenge a legitimate management decision with which an individual disagrees.

5. Our commitments

BOS UK will:

- take all genuine concerns seriously;
- assess concerns objectively and without unreasonable delay;
- appoint an appropriately impartial person to consider or investigate the matter;
- protect confidentiality as far as reasonably possible;
- not tolerate retaliation against anyone raising or assisting with a genuine concern;
- take appropriate action where wrongdoing is identified;
- make any required reports to regulators, law-enforcement bodies or other authorities; and
- maintain appropriate records and provide anonymised oversight information to the Board.

A person does not need to prove that wrongdoing has occurred before raising a concern. A reasonable belief based on the information available is sufficient. A person will not be penalised merely because a genuine concern is ultimately mistaken or not substantiated.

6. How to raise a concern

Concerns may be raised verbally or in writing. A written report is encouraged because it can help BOS UK understand and assess the matter accurately. Where possible, the report should include:

1. the nature of the concern;
2. relevant dates, locations and events;
3. the people involved and witnesses;
4. the reason wrongdoing is suspected;
5. its actual or potential effect;
6. any earlier report; and
7. relevant evidence lawfully available to the individual.

A person must not break the law, access systems without authority, or place themselves or another person at risk in order to obtain evidence.

NORMAL REPORTING ROUTE

Chief Executive Officer: Benjamin Callison
Confidential email: [redacted]
Telephone: [redacted]

If the concern involves the Chief Executive Officer, has not been adequately addressed by the Chief Executive Officer, or the individual does not feel able to approach the Chief Executive Officer, it should be raised using the alternative route below.

ALTERNATIVE REPORTING ROUTE

Chair of the Board of Trustees: Chris Worwood
Confidential email: [redacted]
Telephone: [redacted]

If the concern involves the Chair, it should be raised with the Designated Whistleblowing Trustee or another independent trustee.

CONCERNS INVOLVING THE CHAIR

Designated Whistleblowing Trustee: Christiaan Smith
Confidential email: [redacted]
Telephone: [redacted]

A trustee receiving a concern must immediately consider whether any actual or perceived conflict of interest prevents them from managing it.

7. Confidentiality and Anonymity

BOS UK will treat a whistleblowing disclosure sensitively and seek to protect the identity of the person raising it. Information will be shared only with people who reasonably need it to assess, investigate or respond to the concern.

BOS UK cannot promise absolute confidentiality. Disclosure may be required by law, necessary to protect someone from harm, or essential to a fair investigation. Where disclosure of identity appears necessary, BOS UK will normally discuss this with the individual beforehand unless doing so is prohibited, impracticable or could increase risk.

Anonymous concerns will be considered on their merits. However, anonymity may make investigation and follow-up more difficult, limit feedback, and make it harder to establish whether later treatment resulted from the disclosure. Individuals are therefore encouraged to identify themselves where they feel able to do so.

8. Responding to a Concern

BOS UK will normally:

1. acknowledge receipt within three (3) working days;
2. conduct an initial assessment of the nature, seriousness and appropriate handling of the concern;
3. consider whether immediate protective action is required;
4. appoint an impartial investigator or obtain independent professional advice where appropriate;
5. agree an appropriate method of communication with the person raising the concern;
6. investigate proportionately and without unreasonable delay;
7. take appropriate corrective, disciplinary, legal or regulatory action where warranted; and

8. close the matter with an appropriate written record.

The investigator may meet the person raising the concern and other relevant individuals. Anyone invited to a formal meeting under this policy may request to be accompanied by a work colleague, trade-union representative, or other appropriate support person, subject to reasonable confidentiality requirements.

Where reasonably possible, BOS UK will say whether the matter will be investigated, when the process has concluded, and whether appropriate action has been taken, including reporting to the Charity Commission as required. Detailed information may be withheld because of confidentiality, data-protection, safeguarding, employment, or legal considerations.

9. Independence and conflicts of interest

No person implicated in a concern, or with a material conflict of interest, may control the investigation or determine its outcome. Depending on the concern, the Board may appoint an independent trustee, external HR adviser, accountant, auditor, safeguarding specialist, legal counsel, or other suitably qualified independent investigator.

Where a concern implicates several trustees or raises a serious governance issue, the non-conflicted trustees should seek independent advice and consider promptly notifying the Charity Commission.

10. Protection from retaliation

BOS UK will not tolerate retaliation or detrimental treatment because a person has raised a genuine concern, supported another person raising a concern, provided evidence, participated in an investigation, or refused to conceal wrongdoing.

Retaliation may include dismissal, disciplinary action, threats, bullying, harassment, intimidation, exclusion, reduction of hours, denial of training or promotion, adverse references, or other unfavourable treatment. Anyone who believes they have experienced retaliation should report it immediately to the Chair or Designated Whistleblowing Trustee.

Retaliation may result in disciplinary action up to and including dismissal, or termination of an employee, volunteer, trustee, contractor, or partner relationship. Nothing in an employment contract, settlement agreement, confidentiality agreement, or non-disclosure agreement prevents a worker from making a legally protected disclosure.

11. Knowingly false or malicious reports

BOS UK distinguishes between an allegation genuinely raised but not substantiated and one that is knowingly false or malicious. No action will be taken merely because a genuine concern is not upheld. Deliberately providing information known to be false, fabricating evidence, or making a malicious allegation may result in disciplinary action or other appropriate measures. Any such action must be based on evidence of deliberate misconduct, not simply on the outcome of the original concern.

12. External disclosures

BOS UK encourages concerns to be raised internally where it is safe and appropriate to do so, allowing them to be addressed promptly. A person may nevertheless raise a concern externally where appropriate. Relevant bodies may include:

- the Charity Commission for England and Wales;
- the police or Action Fraud;
- the Health and Safety Executive;
- HM Revenue & Customs;
- the Information Commissioner's Office;
- the Fundraising Regulator;
- the Equality and Human Rights Commission;
- the Environment Agency;
- another prescribed regulator; or
- an independent legal adviser.

Different legal requirements may apply depending on whom the disclosure is made to. Anyone considering disclosure to the media, social media or another non-prescribed external party is strongly encouraged to obtain independent advice first, as statutory protection may be more limited. Nothing in this policy prevents a person from reporting a suspected crime, immediate danger or safeguarding concern directly to an appropriate authority.

13. Charity Commission and serious-incident reporting

The trustees retain ultimate responsibility for deciding whether a matter must be reported to the Charity Commission as a serious incident. On receiving a concern, the Chief Executive Officer, Chair or Designated Whistleblowing Trustee must promptly consider whether it indicates actual or alleged:

- significant harm to beneficiaries, staff, volunteers or others who come into contact with the Charity;
- significant loss of charitable funds or assets;
- significant damage to the Charity's property;
- serious safeguarding failure;
- serious financial crime or fraud;
- serious governance failure; or
- significant harm to the Charity's work or reputation.

Where the reporting threshold is met, the trustees must ensure that a prompt, full and frank report is made to the Charity Commission, including how the Charity is managing the incident. Reporting the matter to the police, another regulator, a donor or another organisation does not remove the trustees' responsibility to consider a Charity Commission report.

14. Overseas operations and partner organisations

A concern may relate to conduct outside the United Kingdom or to an overseas partner, grantee, contractor, or associated organisation. It should still be raised under this policy where it may affect BOS UK's funds, activities, or charitable purposes; people or animals affected by BOS UK-supported work;

grant or partnership compliance; the environment; the safety or wellbeing of staff, volunteers, or communities; the Charity's legal or regulatory obligations; or public trust and confidence in BOS UK.

BOS UK will coordinate with the relevant organisation or authority where appropriate while retaining independent oversight of risks to the Charity.

15. Data protection and record-keeping

Information relating to whistleblowing concerns will be processed in accordance with applicable data-protection law and the Charity's Data Protection Policy. Records will be accurate, factual, securely held, accessible only to authorised individuals, retained only as long as reasonably necessary, and disposed of securely in accordance with the Charity's retention arrangements.

The Charity will maintain a confidential register recording the general nature of concerns, action taken and outcomes. Information presented to the Board for oversight will normally be anonymised unless identification is necessary.

16. Advice and support

INDEPENDENT WHISTLEBLOWING ADVICE

Protect: 0800 055 7214 | www.protect-advice.org.uk
Acas: 0300 123 1100 | www.acas.org.uk
Advice may also be obtained from a trade union, Citizens Advice or an independent legal adviser.

17. Board oversight

The Board of Trustees is responsible for ensuring that appropriate and accessible reporting arrangements exist; concerns are handled independently; those speaking up are protected; required regulatory reports are made; recurring risks and control weaknesses are addressed; and the policy's effectiveness is periodically reviewed.

The Designated Whistleblowing Trustee should provide an anonymised annual report covering the number and general nature of concerns, how they were handled, resolution times, substantiated findings, corrective actions, and recommendations for improving governance or controls.

18. Review and communication

This policy will be reviewed at least every two years and sooner following a relevant change in law or regulatory guidance, a significant whistleblowing incident, a material change in the Charity's structure or activities, or evidence that the policy is not operating effectively.

The policy will be made available to employees, trustees and volunteers and, where appropriate, contractors and partners. Questions should be directed to the Chief Executive Officer, Chair or Designated Whistleblowing Trustee.