Whistleblowing Policy

1.1 Policy

It is important that any fraud, misconduct or wrongdoing by staff or others working on behalf of The Rivers Trust (RT) 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 Trust 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.

1.2 Background

The Public Interest Disclosure Act 1998, which amended the Employment Rights Act 1996, protects workers who report public interest concerns. The Employment Rights Act 2025 further broadened this protection to cover disclosures about sexual harassment.

These are called 'qualifying disclosures'. A qualifying disclosure is one made by an employee who has a reasonable belief that any of the following is being, has been or is likely to be, committed:

- A criminal offence
- A miscarriage of justice
- An act creating risk to health and safety
- An act causing damage to the environment
- Sexual harassment, including where it is reasonably believed that sexual harassment has occurred, is occurring, or is likely to occur.
- A breach of any other legal obligation
- Concealment of any of the above.

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 Trust'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.

Concerns relating to sexual harassment may be raised under this Whistleblowing Policy where they are raised in the public interest and relate to actual or potential wrongdoing. This does not prevent individuals from also raising concerns under the Trust's Respect at Work or Grievance Procedures where appropriate.

1.3 Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff and others working on behalf of the Trust should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, confidentially

and promptly and where possible and appropriate, the outcome of the investigation reported back to the person who raised the issue.

- No employee, or other person working on behalf of the Trust, will be victimised for raising a matter under this procedure. 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 a disciplinary offence.
- This protection applies equally to individuals who raise concerns relating to sexual harassment.
- If misconduct is discovered as a result of any investigation under this procedure, our disciplinary procedure will be used, in addition to any appropriate external measures. Maliciously making a false allegation 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 Trust Chief Executive or to the Chair of the Board of Trustees.

1.4 Procedure

This procedure is for disclosures about matters other than a breach of your own contract of employment, which should be raised via the Grievance Procedure.

1.4.1 Stage 1

In the first instance, any concerns should be raised with the Trust Chief Executive, who will arrange an investigation of the matter. The investigation may involve you and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. Your statement will be taken into account, and you will be asked to comment on any additional evidence obtained. The Trust Chief Executive 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 Trust Chief Executive will also invoke any disciplinary action required. At the conclusion of any investigation, where possible and appropriate, you will be told the outcome and what the Trust has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

1.4.2 Stage 2

If you are concerned that the Trust Chief Executive is involved in the wrongdoing, has failed to make a proper investigation or has failed to, where possible and appropriate, report the outcome of the investigations to the relevant person, you should escalate the matter to the Chair of the Board of Trustees. 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.

1.4.3 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 Environment Agency
- Natural England
- the Serious Fraud Office
- the Charity Commission
- the Pensions Regulator
- the Information Commissioner
- the Financial Conduct Authority.

You can find the full list of prescribed people and bodies here

Whistleblowing: list of prescribed people and bodies - GOV.UK

1.5 Related Policies

- Respect at Work
- Grievance Procedure