

Name of policy	GOV FOPs/P&C - Whistleblowing policy
Last updated/reviewed	March 2026
Update interval	Every three years
Authorised sign-off	BMS Board of Trustees



Whistleblowing policy

1. Introduction

BMS is committed to the highest standards of integrity, transparency and accountability and expects employees and others that work with BMS who have serious concerns about any aspect of BMS' work to voice those concerns.

This policy provides the means by which individuals who have a reasonable belief that there are significant matters of public interest that are causing concerns can report them and ensure that they are appropriately considered.

2. Overview

Whistleblowing is the term used when a colleague passes on information about wrongdoing. Employees who have a concern that the following matters are happening, have happened or are likely to happen, are encouraged to raise this as soon as possible:

- Any bribery, fraud or other criminal offence (Please refer to the [Anti Bribery Policy](#))
- A miscarriage of justice
- A risk to health and safety
- A safe guarding risk (please refer to [Safeguarding Policy](#))
- A risk or actual damage to the environment
- A breach of any other legal or professional obligation
- Concealment of any of the above

2.1 Protection for Whistleblowing

Individuals with a concern do not need to have proof that these things are happening, so long as they have a reasonable belief, concerns should be reported. Concerns raised will be welcomed and treated seriously as part of BMS' commitment to maintain high management standards and good practice. BMS recognises the importance of assuring individuals that they will not be harassed or victimised as a result of raising a legitimate concern.

Claims found to be false or vexatious may be dealt with under the [Disciplinary Policy and Procedure](#). Personal complaints or concerns are not whistleblowing matters and would be covered under the [Grievance Policy and Procedure](#) or the [Bullying and Harassment Policy](#).

2.2 Confidentiality

If requested, BMS will take steps to protect the identity of individuals raising a concern, as far as is reasonably practicable. BMS will not disclose the identity of complainants if asked to maintain confidentiality and would seek consent if disclosure was required to investigate the concern.

3. Blowing the whistle

3.1 Reporting

For Anti Bribery, Fraud ,Corruption or any other criminal concerns the report should be made to the Finance and Operations Director or the Treasurer and General Director if it concerns the Finance and Operations Director. For other concerns reports in the first instance should be made to the Director for People & Culture or the General Director or a member of the Board of Trustees if it concerns the Director of People & Culture. In the case that it is the General Director who is involved in the activity causing concern then a report can be made to the Chair of Trustees Reports to trustees will consequently need to be raised with the appropriate director.

Reports can be made in person or in writing and should cover:

- what the concern is
- the grounds for believing that malpractice has occurred
- any other details.

Acknowledgement will usually be given within five working days where reports have been made. The person receiving the report in consultation with a trustee, will decide whether to investigate the matter and if so, by whom. The person investigating should keep a thorough written record of all stages of the process.

Some concerns may require referral to an external body for consideration and investigation. (e.g. the police, the Health and Safety Executive, BMS's auditors, the relevant regulatory body) but a preliminary internal investigation may be undertaken first.

Reports can be made anonymously and will be taken seriously, but it may be difficult to complete a full and complete investigation if it is not possible to follow up with the individual raising the concern.

3.2 Outcomes

Due to confidentiality, BMS may not be able to disclose investigations taking place, or action taken on the issue that was raised. Wherever possible, BMS will seek to share the outcome in confidence with the individual who raised the concern.

If an individual is unhappy with the outcome of an investigation by BMS, this should be put in writing to the Chair of the Trustees within five working days of the employee having received notification of the outcome. If necessary, the investigation and decision will be reviewed by a panel of directors and trustees not involved in the original investigation and decision to ensure it was conducted in accordance with due process and based on the evidence available.

3.3 Legal protection

The Public Interest Disclosure Act 1998 (PIDA 1998) provides legal protection for UK-based employees who raise certain concerns in the public interest. BMS is committed to enabling all employees, including those based globally, to raise concerns in confidence without fear of dismissal or other detriment for disclosing serious matters.

- Volunteers and self-employed individuals are not covered by PIDA 1998.
- To retain the protection offered by the Act, employees are generally expected to follow their employer's internal procedure, except in the most exceptional circumstances.
- For global staff, local legal requirements will be observed. Where those protections are less prescriptive, BMS will seek, wherever reasonably practicable, to apply standards comparable to those under UK legislation.

FOPS and P&C

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