

Whistleblowing and Investigations Corporate Policy

[This policy is under review following the BBC Culture Review]

Why this Policy matters

Whistleblowing investigations are essential for maintaining the highest standards of ethics, honesty, openness and accountability at the BBC. We treat all allegations of wrongdoing seriously: violations of the law and regulations; or breaches of our Code of Conduct, serious malpractice of our Editorial Guidelines or our Corporate Policies. We encourage anyone with concerns about wrongdoing to report them.

In most cases, workplace concerns can be raised and resolved, informally or formally, through the normal management chain, or routes such as the Respect at Work Corporate Policy. However, where these channels may be inappropriate, whistleblowing allows you to raise concerns of serious misconduct confidentially and, if preferred, anonymously.

This Policy outlines how we handle whistleblowing concerns and, where appropriate, conduct investigations to address allegations of wrongdoing. We may also need to investigate our own operations as a result of external allegations, inquiries or other legal proceedings.

Definition of Whistleblowing at the BBC

Our Whistleblowing framework is intended for the receipt, management and investigation of concerns of serious malpractice occurring within our operations, whether committed by individuals or at a corporate level. Ordinarily, these are concerns in which there is a 'public interest'.

Who this Policy applies to

This Policy applies to you if work for, or represent, the BBC or one of its subsidiaries. This includes, but is not limited to:

- employees, full-time or part-time
- those on a fixed term or temporary contract
- freelancers, contractors or consultants
- volunteers or interns

Guiding principles

We are committed to the following guiding principles for whistleblowing disclosures:

- We encourage prompt and confidential reporting of honestly-held concerns about wrongdoing at the BBC.

- We do not tolerate the unfair treatment or victimisation of anyone raising an honestly-held concern, or any other attempt to interfere with a whistleblowing process or investigation. This includes the victimisation of anyone mistakenly believed to be a whistleblower
- We apply practical measures to protect the identity of whistleblowers, including through any subsequent investigation or other related internal processes.
- We conduct whistleblowing-led investigations fairly, confidentially and without unreasonable delay. We aim to complete investigations within 12 weeks.
- We maintain a duty of care to all parties involved in a whistleblowing-led investigation, including whistleblowers, witnesses and subjects of allegation.

The essential things you must do or not do

These high-level essential mandatory requirements are the most important for you to understand and follow to meet the Policy objectives.

Confidentiality

1. Whether you raise or receive a concern, you must not seek to investigate the matter yourself and you must treat any disclosure as strictly confidential.

“Not investigating” includes not discussing the concern with potential witnesses or accessing documents or other information not ordinarily available to you.

“Strictly confidential” means not discussing the concern with anyone else (other than those referenced in this Policy) and, for those receiving a concern, not disclosing the identity of the person raising the concern to anyone else without their consent.

Raising a Concern

2. If you have a concerns which may fall within the scope of Whistleblowing, you must use established channels to raise the concern,

Established channels for raising concerns, orally or in writing :

- Internal Line Management (including your line manager, more senior manager, or relevant HR Business Partner)
- The Director of Quality, Risk and Assurance
- The Senior Non-Executive Director on the Board
- The confidential and independent NAVEX Global reporting line
- A Senior Editorial Figure (for concerns of serious editorial malpractice)

If you are not comfortable raising your concern with any of the recommended internal contacts, or if those routes have been followed and you still have concerns, you may also consider [seeking advice via listed external organisations](#).

Receiving a Concern

3. If you receive a concern that you believe may be within the scope of this policy, you must immediately contact the Head of Whistleblowing

4. You must not victimise or treat anyone unfairly for raising a concern. You must take proactive measures to protect their identity and prevent exposure to risk of victimisation or unfair treatment by others.

The identities of those who raise concerns will not be disclosed without consent unless there is a legal requirement to do so.

What Happens Next?

All concerns received via the Whistleblowing framework will be subject to triage to determine whether the issue(s) raised are within the scope of this policy, or otherwise if an alternative reporting route or other escalation may be appropriate.

You will receive regular updates from the Whistleblowing team once you report a concern who will advise on the information you should expect to receive and at what stage(s) in the process, and can signpost you towards support.

The guiding principles of this policy shall apply irrespective of the triage outcome.