



BBC Media Action

Whistleblowing

Policy

Policy Owner	BBC Media Action Board of Trustees
Person Responsible	Chief Executive Officer
Date Approved	May 2024
Date for next review	3 years (May 2027) Factual update December 2025

BBC Media Action's protected disclosure or 'whistle blowing' policy

If you have a concern about something inappropriate that is happening within BBC Media Action, we would like to hear about it. Anything you tell us will be dealt with in confidence, and we will not reveal your identity to anyone else, inside or outside of the organisation, without your permission.

Perhaps you're concerned that someone is at risk of being hurt in the course of our work, and that those responsible are not taking these risks seriously enough. Or you may be worried that someone is taking money, committing fraud, or involved in some other corrupt practice

For any safeguarding concerns, we encourage everyone to make use of the reporting process that is set out in BBC Media Action's safeguarding policy.

If you do have a concern, please **speak to your line manager or your country director** in the first instance. If for any reason you feel that you can't speak to your line manager or your country director, you can contact one of the following people within BBC Media Action:

- **For concerns relating to fraud, corruption or misuse of resources**, please contact Laura Collier-Keywood, Chief Operating Officer, BBC Media Action, on laura.collier-keywood@bbc.co.uk.
- **For safeguarding or editorial concerns**, please contact Richard Lace, Director of Programmes, on richard.lace@bbc.co.uk.
- For **data privacy** and **data protection concerns** please contact dpo.bbcmmediaaction@bbc.co.uk.
- If you need to speak to someone urgently, you can call **+44 203 397 4441**.
- To contact someone who is independent of BBC Media Action's senior management, please contact Balram Veliath, Director, Quality, Risk and Assurance, on Balram.Veliath@bbc.co.uk.

Any concerns about an FCDO-funded project (such as safeguarding, aid diversion, fraud, money laundering or counter terrorism) can also be reported to FCDO's Whistleblowing Unit - reportingconcerns@fcdo.gov.uk or +44 (0) 1355 843747.

BBC Media Action has adopted the BBC's full **Whistleblowing and Investigations Corporate Policy** (launched on 3 July 2025). This document has additional options for reporting concerns about BBC Media Action, and provides guidance about UK law and some considerations specific to the BBC. The policy is set out in full below.

BBC Whistleblowing and Investigations Corporate Policy

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.

This Policy is connected to **our value Trust in our Code of Conduct**.

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'. You may read more detail on the **types of concerns that fall within the scope of this Policy**.

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

If you work in Public Service Broadcasting outside the UK, local variations may apply in line with relevant laws and regulations. Check with your local management.

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.

In addition to these, there are detailed requirements and best practices outlined in supporting procedures and guidance, linked below. Read this information when you need to understand the detail.

If you have any concerns or conflicting priorities that prevent you following essential requirements, please discuss them with one of the people listed in the section under ‘Where to go for help and exceptions’. Without an approved exception, breaches may put the BBC at risk and may result in **disciplinary action**, up to and including dismissal, or termination of our relationship with you.

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)

You may read more about the **reporting channels available**.

We encourage you to raise any concerns promptly, as soon as you become aware of the issue. You may read more about **how to raise your concern and what information to include**.

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 (Nick Clark), or one of the reporting points listed above.

You may read more about **how to handle a concern**.

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. You may read more about **our assurances to whistleblowers**, including measures to prevent victimisation and protect confidentiality.

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 may read more in the **Whistleblowing FAQs**.

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.

Where to go for help or an exception

For general advice on this Policy or to suggest improvements, contact the First Point of Contact listed below.

For specific questions or concerns, you can also speak with your line manager or HR Business Partner.

For confidential support, you may access the **Employee Assistance Programme**.

Appeals against whistleblowing case outcomes, or complaints regarding a Whistleblowing-led process, may be raised to the **Whistleblowing Champion**, who is the independent non-executive director on the BBC board.

If you believe you need a business-critical exception to this Policy, please complete and send the **exception to policy request template** to the First Point of Contact listed below. If appropriate, they will facilitate exception approval from the Policy Owner.

Note that exceptions are rare and must be thoroughly justified. No exceptions can be made to legal requirements.

For employees outside the UK, please consult your local management for guidance on regional variations or additional support options.

Responsible individuals

First Point of Contact: Nick Clark – SSR Manager

Policy Owner: Balram Veliath – Director of QRA

Executive Sponsor: Leigh Tavaziva – Group Chief Operating Officer