

Versions Issued

Version No.	Date	Description of Amendment	Approved by:
1.0	1 May 2025	Creation of Policy	SEG Board

This document is the property of the Sustainable Eel Group. It is effective from the date above.

1. Purpose and scope

- 1.1 The Sustainable Eel Group (SEG) is committed to maintaining the highest standards of integrity, transparency, and accountability in all its operations. This Whistleblower Policy provides a framework and procedures for individuals to raise concerns about potential wrongdoing or improper conduct within SEG, or the wider SEG system including certificate holders and conformity assessment bodies, without fear of reprisal.
- 1.2 This policy applies to all stakeholders, staff, board members, volunteers, contractors, partners, and any other individuals working with or on behalf of SEG.
- 1.3 The policy covers any concerns related to:
 - Malpractice, fraud, or corruption,
 - Illegal activities,
 - Breaches of SEG's policies and procedures,
 - Endangerment of health and safety,
 - Environmental damage,
 - Abuse, harassment, discrimination, or safeguarding violations,
 - Any other conduct, or absence thereof, that may harm SEG's reputation or interests, or jeopardize its objectives.
- 1.4 This policy is designed to align with the principles of the ISEAL Code of Good Practice, emphasising, stakeholder engagement, and ethical conduct.

2. Principles

- 2.1 Any individual with a concern is encouraged to raise their concern and not keep it to themselves or ignore it. Raising concerns with reasonable grounds should be safe and without fear of any retaliation.
- 2.2 Whistleblowers shall act in good faith (honestly and reasonably, even if mistaken) when reporting concerns or information that may represent a violation. The whistleblower shall have reasonable grounds for believing the information disclosed indicates wrongdoing.

- 2.3 SEG encourages and protects whistleblowers who come forward and report concerns, provided that these are made in good faith, and in the reasonable belief that the conduct reported indicates wrongdoing.
- 2.4 The protective measures for the whistleblower include confidentiality, anonymity (where possible) and prohibition of retaliation. Detailed information and conditions regarding the protective measures are outlined in this document.
- 2.5 **Protection:** SEG prohibits any form of retaliation against individuals who raise genuine concerns under this policy.
- 2.6 **Confidentiality:** SEG will treat all reports with confidentiality, to the extent possible and consistent with the need to investigate and take action without jeopardising the identity of the whistleblower.
- 2.7 **Impartiality:** All concerns will be investigated fairly and impartially.
- 2.8 **Accountability:** SEG is committed to taking appropriate action to address any wrongdoing identified through this process.

3. Reporting Procedures

3.1 How to Report:

- Concerns should be reported to the designated Whistleblowing Officer, who shall be David Bunt: d.bunt@sustainableeelgroup.org.
- If the concern involves the Whistleblowing Officer, it should be reported to a designated Board member,
- Reports can be made in writing or verbally,
- Individuals are encouraged to provide their name and contact information, but anonymous reports will also be accepted and investigated.

3.2 Information to Include:

- The nature of the concern,
- Details of the individuals involved if known,
- Dates, times, and locations of the incident(s) if known,
- Any supporting evidence.

3.3 **Acknowledgement:** The Whistleblowing Officer will acknowledge receipt of the report within 5 working days and provide an initial indication of how the matter will be handled.

4. Investigation Process

- 4.1 Consistent with ensuring the whistleblower's confidentiality and safety, SEG will conduct a thorough and objective investigation of all reported concerns.
- 4.2 The investigation will be conducted in a timely manner, and the individual who raised the concern will be kept informed of the progress, providing contact information is available, where appropriate.
- 4.3 SEG may involve internal or external experts to assist with the investigation.

5. Protection of Whistleblowers

5.1 SEG will take all necessary steps to protect the identity and safety of whistleblowers.

- 5.2 SEG will not tolerate any form of reprisal or victimisation against individuals who raise concerns in good faith. This includes:
- Dismissal, demotion, or disciplinary action.
 - Harassment, intimidation, or threats.
 - Discrimination or unfair treatment.
- 5.3 Any individual who retaliates against a whistleblower will be subject to disciplinary action.

6. Outcomes and Follow-up

- 6.1 At the conclusion of the investigation, SEG will take appropriate action, which may include:
- Disciplinary action.
 - Suspension or withdrawal of certificates or approvals.
 - Increased surveillance and oversight.
 - Changes to policies and procedures.
 - Legal action.
 - Referral to external authorities.
- 6.2 The whistleblower will be informed of the outcome of the investigation, providing contact information is available, and where appropriate and consistent with confidentiality considerations.

7. Linkage to SEG's Theory of Change

- 7.1 SEG's Theory of Change outlines how the organisation aims to achieve its long-term vision of 'biologically safe wild eel populations'.
- 7.2 This Whistleblower Policy and Procedure supports the Theory of Change by:
- Ensuring Ethical Conduct
 - Promoting Accountability
 - Strengthening Governance
- 7.3 By upholding these principles, this policy helps SEG create the conditions necessary for the successful implementation of its strategies and the achievement of its sustainability objectives.

8. Monitoring and Review

- 8.1 This policy will be regularly monitored and reviewed annually with the annual management system review to ensure its effectiveness and alignment with best practices and ISEAL Code requirements.