

WHISTLEBLOWING POLICY AND PROCEDURE

1. Introduction

- 1.1 As an employee, archdeacon, member of General Synod or diocesan Boards, Councils and Committees or volunteer you may be the first to suspect or identify serious misconduct or malpractice which could compromise the reputation of the Chichester Diocesan Fund and Board of Finance (Incorporated) (“the DBF”). It is in the DBF’s interest to encourage you both to raise concerns and to raise them internally in the first instance with the confidence that you will be listened to, and if necessary, be protected.

2. Definition

- 2.1 Whistleblowing is when a complainant knows, or suspects, that there is some wrongdoing occurring within the DBF and alerts the relevant senior manager, department or the relevant authority accordingly. The DBF accepts that it is bound by legislation in the Public Interest Disclosure Act 1998 and guarantees that procedures will be invoked in ways which do not prejudice the whistle-blower’s own position and prospects.
- 2.2 The policy of the DBF is to safeguard the interests of any of its employees, office holders, contractors working for it under umbrella bodies and volunteers when they act as whistleblowers regarding any wrongdoing whether by action or by neglect.

Whilst the Public Interest Disclosure Act 1998 does not provide the same protection for all categories of people within the Diocese of Chichester (the Act does not cover voluntary roles for example) the DBF adopts the same approach for all in their protection.

3. Actions to be taken by the Employee

- 3.1 If a whistleblower knows, or suspects, that some wrongdoing, for example something dangerous, corrupt or illegal, is occurring within the DBF, he or she should raise the matter immediately with the appropriate manager. If they do not know who to approach, he or she should, in the first instance, talk to his or her line manager, HR or the Diocesan Secretary. The concern should then be passed to the Diocesan Secretary for investigation as soon as possible and in any event within 15 days.
- 3.2 If a potential whistleblower feels he or she needs to take advice before raising his or her concern, he or she may contact the independent charity, Public Concern at Work on 020 7404 6609, whistle@pcaw.org.uk or www.pcaw.co.uk. They provide free, confidential legal advice on how to raise a concern about serious malpractice at work.
- 3.3 If the whistleblower is reporting the wrongdoing at a meeting with a manager, he or she may like to be accompanied by a fellow employee, friend or legitimate adviser.

4. Possible Situations

- 4.1 Although this list is not exhaustive, examples of situations in which it might be appropriate for someone to report a wrongdoing include:
- a breach, or potential breach, of health and safety legislation

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- failure to adhere to safeguarding legislation, statutory guidance and House of Bishops' policies regarding the protection of children and adults
- financial irregularities
- harassment or bullying of a colleague, customer or other individual
- damage to the environment
- committing of a criminal offence
- an act of bribery
- attempts to conceal any of the above.

5. Action to be taken by the Manager

- 5.1 Any manager who is informed by a whistleblower of potential wrongdoing will take immediate action to report the matter to the Diocesan Secretary and to investigate the situation. In doing so, the manager will take every possible step to maintain the anonymity of the individual who has made the allegation of wrongdoing.
- 5.2 The whistleblower who has raised the issue of a wrongdoing will be kept informed of any investigation that is taking place. They will also be informed of the outcome of the investigation. It might not always be appropriate to tell the whistleblower the detail of any action that is taken, but they will be informed if action is taken.
- 5.3 The Diocesan Secretary will report any concerns that have been brought to his or her attention to the chair of the Audit Sub-Committee at the next meeting of the Sub-Committee.

6. Alerting Outside Bodies to a Potential Wrongdoing

- 6.1 A whistleblower should always, in the first instance, talk to a manager in the DBF about a potential wrongdoing. If they are not satisfied with the response, he or she is entitled to contact a relevant external body to express the concerns. In doing this the whistleblower should:
- have a reasonable belief that the allegation is based on correct facts
 - not be making any personal gain from the revelations
 - make the disclosure to a relevant body.
- 6.2 A "relevant body" is likely to be a regulatory body (e.g. the Health and Safety Executive, or the Financial Services Authority) or a professional body (e.g. the ICAEW or RICS).

7. Contacting the Media

- 7.1 The media is **not** a relevant external body. Whistleblowers should not contact the media with allegations about the DBF.

8. Protection Against Detriment

- 8.1 Any whistleblower who takes action under the Public Interest Disclosure Act 1998 will be protected from any detriment in relation to any allegations that are made.

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8.2 If the whistleblower does not follow the procedure set out, which encompasses the requirements of the Public Interest Disclosure Act 1998, the protection against detriment will not apply. Disclosing information in an inappropriate way (e.g. contacting the media) could result in disciplinary action being taken against the whistleblower, which could include dismissal.

9. Review

9.1 This policy shall be reviewed on an annual basis. The next review is due in December 2017.

Revision History

Revision No.	Date Issued	Prepared By	Approved	Comments
1	19.12.2016	AQ	Bishop's Council 15.12.2016	New policy