

WHISTLEBLOWING POLICY

1. PURPOSES OF THE POLICY

- 1.1 To clarify the Diocese's policy regarding the protection against victimisation or dismissal for employees who blow the whistle on criminal behaviour or any other wrongdoing.
- 1.2 The policy applies to all employees, visitors, contractors, including directors, officers, consultants, clergy, contractors, trainees, part-time and fixed-term workers, casual and agency employees and volunteers.

2. GENERAL

- 2.1 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities.
- 2.2 Employees may feel that they have a lot at stake when considering whether and how to blow the whistle where malpractice has occurred.
- 2.3 Whistleblowers may fear that management will be tempted to 'shoot the messenger', but this policy will clarify how and when a whistleblower will be protected from disclosure.
- 2.4 We hope that employees will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise a concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

3. QUALIFYING FOR PROTECTION

- 3.1 An employee will qualify for protection from victimisation or dismissal for disclosure of information if it relates to one of the following incidents:
 - a criminal offence;
 - financial impropriety of any kind;
 - a failure to comply with a legal obligation;
 - a miscarriage of justice;
 - the endangering of an individual's health and safety;
 - damage to the environment;
 - deliberate concealment of information relating to any of the above.

4. PROCEDURE

- 4.1 It is important that you are aware of the procedure that will generally be followed should you wish to disclose information regarding the above.
- 4.2 Employees should disclose information to the Chief Operating Officer or the Vicar General.
- 4.3 Where the matter to be disclosed relates to the COO or other managers, you may raise the matter with any of the Diocese's Trustees.
- 4.4 The investigation will take place as quickly as reasonably possible by either the COO or the HR Consultant retained by the Diocese (or if appropriate, the respective trustee), and will normally be concluded within 7 working days (depending on the extent of the disclosure).
- 4.5 The COO (or, if appropriate, the respective trustee) will notify you in writing of the outcome of disclosure of information. Where investigations exceed 7 days you will be notified as to the progress and status of the matter.
- 4.6 Employees must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe you have suffered such treatment, you should inform the COO or HR Consultant (or respective trustee) immediately.
- 4.7 The disclosure must be made in good faith and the employee must have reasonable suspicion that the alleged malpractice has occurred, is occurring or is likely to occur. If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.
- 4.8 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any workplace wrongdoing. It is therefore hoped that it will not be necessary for workers to alert external organisations. However, in very serious circumstances, or following an internal report which has not been addressed, the Diocese recognises that it may be appropriate for an employee to report their concerns to an external body, such as a regulator or the Police. It will very rarely, if ever, be appropriate to alert the media.
- 4.9 The Diocese strongly encourages employees to seek advice before reporting a concern to anyone external.
- 4.10 The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Protect can be contacted by telephone on T: 020 3117 2520 and by email at via W: protect-advice.org.uk/contact-protect-advice-line

This policy is due for review before the end of October 2026.