

Whistleblowing Policy

St Peter's, Colchester

Adopted by the PCC: [tbc]

Review date: [3 years]

Policy owner: The Parochial Church Council

1. Purpose

This policy explains how serious concerns about wrongdoing, risk, malpractice or abuse may be raised at St Peter's, how those concerns will be considered, and how St Peter's will seek to protect those who raise genuine concerns honestly and responsibly.

The Parochial Church Council has responsibility for the governance and oversight of St Peter's, and PCC members serve as charity trustees. St Peter's is committed to honesty, openness, accountability and proper stewardship.

As disciples of Jesus Christ, we seek to be faithful in all that we say and do. That includes bringing serious concerns into the light, protecting those who may be at risk, using charitable resources properly, and acting with truth, courage, fairness and care.

This policy is intended to encourage staff, volunteers, PCC members, church officers, contractors and others connected with the church to raise serious concerns as soon as reasonably possible, knowing that their concerns will be taken seriously, handled carefully, and treated with appropriate confidentiality.

2. Scope

This policy applies, as relevant, to:

- employed staff;
- volunteers;
- PCC members;
- churchwardens and other elected or appointed officers;
- ministry leaders;
- contractors and others providing services to St Peter's;
- others connected with the work of the church who have a serious concern about wrongdoing.

This policy is not intended to replace St Peter's safeguarding procedures, complaints policy, grievance procedures, employment procedures or pastoral care arrangements. Where another policy is the proper route, the concern may be referred to that process.

Whistleblowing must not be used simply to reopen or review a matter already dealt with under another appropriate process. However, if a person has a serious concern about wrongdoing, concealment, abuse of process, risk to others, or failure to act properly, that may still be capable of being raised under this policy.

Safeguarding concerns must always be handled through St Peter's safeguarding procedures.

3. Christian foundation

The church is called to walk in truth, justice and light. Wrongdoing should not be hidden or ignored, especially where people may be harmed, trust abused, resources misused, or the witness of the church damaged.

The Apostle Paul writes:

"Take no part in the unfruitful works of darkness, but instead expose them."
– Ephesians 5:11, ESV

Raising a serious concern should therefore be understood not as disloyalty, but as a responsible act where the concern is raised honestly, carefully and for the good of others.

4. What whistleblowing means

Whistleblowing means raising a serious concern about wrongdoing, risk or malpractice, usually where the matter is in the public interest or affects others.

This may include concerns about:

- actual or suspected criminal offences;
- failure to comply with legal obligations;
- serious safeguarding failures or risk of harm;
- serious health and safety risks;
- financial malpractice, impropriety, fraud, bribery or misuse of charitable funds;
- serious data protection or confidentiality breaches;
- professional malpractice;
- serious misconduct, abuse of power or unethical behaviour;
- damage to the environment;
- deliberate suppression, aiding, abetting or concealment of any of the above;
- other illegal behaviour or serious malpractice which cannot properly be raised under another policy.

Whistleblowing is different from an ordinary complaint, personal grievance or disagreement. A complaint is usually about how someone has personally been treated. A whistleblowing concern is about serious wrongdoing, risk or malpractice affecting others, the church, the public, charity assets or legal responsibilities.

A person raising a concern does not need to prove wrongdoing. They should, however, have a genuine concern and provide as much accurate information as they reasonably can.

5. Raising a concern

Concerns should be raised as soon as reasonably possible.

Where appropriate, the concern may be raised with:

- the Vicar;
- the churchwardens;
- the Church Administrator;
- the relevant Ministry Area Leader or line manager;
- the Parish Safeguarding Officer or Safeguarding Team;
- the PCC Standing Committee;
- another PCC member, where other routes are not suitable.

If the concern relates to the Vicar, it should normally be raised with the churchwardens, the archdeacon, the Parish Safeguarding Officer, the diocesan safeguarding team, or another appropriate diocesan officer, depending on the nature of the concern.

If the concern relates to a churchwarden, PCC member, employee, volunteer leader or other person in authority, it should be raised with an appropriate person who is not involved in the matter.

If the person raising the concern is a third party, contractor or hirer, they should normally raise the concern with their key contact at St Peter's, the Church Administrator, the Vicar, the churchwardens, the Parish Safeguarding Officer, or another appropriate person.

Concerns may be raised verbally or in writing. Where possible, the person raising the concern should provide:

- what happened or may happen;
- who is involved;
- when and where it happened;
- any relevant documents, messages, records or evidence;
- whether anyone may be at immediate risk;
- whether the concern has already been raised with anyone else.

6. How St Peter's will respond

St Peter's will seek to respond to whistleblowing concerns fairly, carefully and proportionately.

Normally, St Peter's will:

- acknowledge the concern;
- make a written record;
- consider whether the matter falls within this policy or should be handled under another policy;
- consider whether anyone is at immediate risk;
- decide who should review or investigate the matter;

- take safeguarding, legal, HR, diocesan, Charity Commission, police or other advice where appropriate;
- keep the person raising the concern informed, where possible and appropriate;
- keep records of the concern, process, decision and actions taken.

Some concerns may be resolved by clarification, correction, training, improved procedures or other immediate action. Others may require formal investigation, safeguarding action, employment action, referral to the PCC, diocesan advice, notification to insurers, reporting to statutory authorities, or serious incident reporting to the Charity Commission.

Where a formal investigation is needed, it should be carried out by a suitable person with appropriate independence, authority and experience. The investigation should be conducted as promptly as the circumstances reasonably allow.

Where appropriate and fair, the person who is the subject of the concern should be told enough about the concern to be able to respond. This must be balanced with safeguarding, confidentiality, legal, employment and governance responsibilities.

The person raising the concern may be invited to a meeting to discuss the matter. They may normally be accompanied by a suitable person, provided that person agrees to maintain appropriate confidentiality.

7. Possible outcomes

Following initial review or investigation, St Peter's may decide that:

- the concern should be investigated formally;
- the concern has been investigated and relevant action has been taken;
- the concern should be referred to another person, body, policy or procedure;
- the concern should be handled under safeguarding, complaints, employment, grievance, disciplinary, finance, health and safety, data protection or another procedure;
- the concern should be reported to the diocese, Charity Commission, police, local authority, insurer or another appropriate body;
- there are no grounds for further action.

The person raising the concern will normally be told the outcome as far as is possible and appropriate. However, confidentiality, safeguarding, legal, employment and data protection responsibilities may limit the amount of detail that can be shared.

8. Confidentiality and anonymous concerns

St Peter's will seek to protect the identity of a person who raises a concern where possible and appropriate.

However, confidentiality cannot always be guaranteed. It may be necessary to share information where:

- someone is at risk of harm;

- safeguarding procedures require it;
- legal, employment, disciplinary or governance processes require it;
- the matter must be referred to the diocese, Charity Commission, police, statutory authorities or insurers;
- the person complained about needs enough information to respond fairly;
- the concern cannot otherwise be properly investigated.

Where possible, St Peter's will discuss this with the person raising the concern before their identity is shared.

The person raising the concern should also treat information about the concern, review or investigation confidentially, unless there is a proper reason to share it.

Anonymous concerns may be considered, but they can be harder to investigate. St Peter's will decide how to handle an anonymous concern by considering the seriousness of the issue, the information provided, the possibility of verification, and the risk to people, the church or the public.

9. Protection from victimisation

St Peter's will seek to protect anyone who raises a genuine concern honestly and responsibly.

No one should be dismissed, penalised, bullied, threatened, victimised, removed from a role, or treated adversely because they have raised a genuine concern under this policy.

This applies even if the concern turns out to be mistaken, provided it was raised honestly and responsibly.

Victimisation or retaliation may itself be treated as misconduct and may lead to action under employment, volunteer, safeguarding, complaints, conduct or disciplinary procedures.

If someone believes they have been treated badly because they raised a concern, they should report this to the Vicar, churchwardens, PCC Standing Committee, Parish Safeguarding Officer, diocesan officer or another appropriate person.

10. Malicious or knowingly false allegations

Concerns should be raised truthfully, responsibly and without malice.

If someone knowingly makes a false allegation, acts maliciously, or raises a concern for personal gain or improper purposes, St Peter's may take appropriate action. This may include pastoral correction, withdrawal from a role, employment action, or use of another relevant policy.

This should not discourage anyone from raising a genuine concern, even where they are unsure or later turn out to be mistaken.

11. External reporting

This policy is intended to provide a clear internal route for raising serious concerns. In many cases, internal reporting will be the most appropriate first step.

However, nothing in this policy prevents a person from reporting:

- a safeguarding concern to the diocesan safeguarding team, local authority or police;
- a suspected crime to the police;
- serious wrongdoing in a charity to the Charity Commission;
- a matter to another prescribed regulator or public authority where appropriate;
- a concern under any legal right or duty they may have.

A person considering external disclosure may wish to seek independent advice first.

12. Support and advice

Those raising concerns may seek advice and support from an appropriate person within St Peter's, from the diocese, or from an independent advice body.

Protect, the UK whistleblowing charity, provides confidential advice to people considering raising whistleblowing concerns.

Contact details:

- Protect advice line: 020 3117 2520
- Website: protect-advice.org.uk

St Peter's contacts:

- Church Office: office@stpeterscolchester.org
- Safeguarding: safeguarding@stpeterscolchester.org

13. Related policies and documents

This policy should be read alongside, where applicable:

- Safeguarding Policy;
- Code of Conduct;
- Welcome, Dignity and Fair Treatment Policy;
- Complaints Policy;
- Staff Handbook and employment policies;
- Volunteer Policy;
- Conflict of Interest Policy;
- Finance Policy and financial procedures;
- Health and Safety Policy;
- Data Protection Policy;
- Privacy Notice;
- Risk Register and relevant risk assessments;
- relevant Church of England, diocesan and Charity Commission guidance.

14. Review

This policy will be reviewed by the PCC every three years, or sooner if required by changes in law, Church of England guidance, diocesan guidance, Charity Commission guidance, safeguarding requirements, parish practice or governance need.

The PCC is responsible for ensuring that this policy remains legally responsible, pastorally wise, practically useful, and consistent with the doctrine and discipline of the Church of England and the charitable responsibilities of St Peter's.

short public-facing summary

Whistleblowing Policy

St Peter's is committed to honesty, openness and accountability.

Whistleblowing means raising a serious concern about wrongdoing, risk or malpractice. This may include criminal activity, safeguarding failures, serious health and safety risks, financial malpractice, serious misconduct, legal breaches, data breaches or deliberate concealment.

Whistleblowing is not the same as an ordinary complaint or personal grievance. It is about serious concerns affecting others, the church, the public, charity assets or legal responsibilities.

Concerns should be raised promptly with an appropriate person, such as the Vicar, churchwardens, Church Administrator, Parish Safeguarding Officer, Safeguarding Team, PCC Standing Committee or another suitable person.

Safeguarding concerns must always be handled through safeguarding procedures.

St Peter's will seek to protect those who raise genuine concerns honestly and responsibly. Victimisation or retaliation will not be tolerated.

Concerns should be raised truthfully, responsibly and without malice. Where appropriate, concerns may also be reported externally to the police, Charity Commission, diocesan safeguarding team, statutory authorities or another prescribed body.