

1. Overview

This policy applies to all persons working for us or on our behalf, including trustees, employees and volunteers at all levels whether permanent or temporary. Throughout this document we will refer to these groups of people as stakeholders.

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. By promoting a culture of openness within our church, stakeholders are encouraged to raise issues which are of concern in the running of a church. at work. By knowing about malpractice at an early stage, steps can be taken to safeguard the interests of all stakeholders and prevent fraud and corruption before it happens. Everyone is encouraged to “speak up” or “blow the whistle” if they believe malpractice may be occurring.

2. Aim

The aim of the policy is to help stakeholders to raise any serious concerns they may have about colleagues or Holy Trinity with confidence and without having to worry about being victimised or disadvantaged in any way as a result.

It will also advise on the protection they will receive from us and offered under the Public Interest Disclosure Act 1998 (PIDA).

3. Whistleblowing policy

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

Sometimes we may have concerns about events that are taking place in our church. Generally, these concerns are resolved through provision of information and informal discussions with a senior person. When an individual feels that the informal route is not appropriate they make a formal disclosure.

4. Protection of the whistle-blower

Individuals may be anxious that, by reporting genuine whistleblowing concerns their actions may leave them vulnerable. It is important to emphasise that we will not tolerate the victimisation, intimidation or penalisation of anyone raising a genuine concern, anyone involved in the subsequent investigation or anyone acting as a witness.

Anyone responsible for any such action against individuals making genuine disclosures will be the subject of disciplinary action.

Whistleblowers’ receive protection under the PIDA Act.

5. Reporting your concern informally

Stakeholders may raise their concern informally with any member of the Parochial Church Council [PCC]. This may be a verbal discussion or in writing. The issue will be treated in confidence. If the manager cannot deal with it they will take it to either the PCC Secretary, or the Vicar.

Where the stakeholders is not comfortable speaking with the PCC member and remains unsure whether to use this procedure or to begin whistleblowing action, then they can obtain independent advice by contacting the charity Public Concern at Work on 0207 404 6609.

All concerns will be investigated and dealt with as appropriate. The PCC member will ensure that the Vicar and/or PCC Secretary are informed and involved as appropriate.

The stakeholder who raised the concern or issue will be informed of the outcome of the investigations and what, if any, action has been taken.

If the stakeholder is unhappy about the speed, conduct or outcome of the investigation, they should put their concerns in writing to the PCC Secretary. If their concern is about the Vicar or the PCC Secretary they should contact the Area Dean who will investigate the complaint, and report back to the stakeholder.

6. Reporting your concern formally

Upon reaching a decision to carry out a formal disclosure, stakeholders should be reminded of their duty of confidentiality to Holy Trinity. All formal concerns MUST be raised in writing (in a letter or in an email) to the PCC Secretary or if it is inappropriate to involve the PCC Secretary then to the Area Dean, who will handle the disclosure to the agreed procedures in place.

The person receiving the disclosure is referred to throughout this policy as the Appropriate Person, and will remain consistent throughout the process.

Importantly, and to guarantee protection under the regulations, a whistleblower must meet specified criteria so that their disclosure can be considered a qualifying disclosure under the PIDA Act. These are as follows:

- The disclosure must be made to an appropriate person
- The person making the claim must have reasonable belief that wrongdoing is being or is about to be committed
- The person must reasonably believe it to be substantially true and that the disclosure is in the public interest
- The person making the claim should not collect the information to support the allegations improperly

7. Malicious whistleblowing

Where it is found that the whistleblower makes an allegation maliciously and:

- Does not act in the public interest
- Makes an allegation without having reasonable grounds for believing it to be substantially true
- Collects the information to support the allegations improperly
- Makes an allegation for personal or 3rd party gain

They will be subject to formal disciplinary action, up to and including dismissal or termination of any agreement and in some cases may be subject to criminal investigation where illegality has occurred in order to achieve those aims.

Additionally, where this criterion is met or the stakeholder engages in improper conduct in relation to whistleblowing, they are unlikely to be protected as a whistleblower under the PIDA Act.

8. Reporting by non- stakeholders

Whilst the majority of disclosures will be made by stakeholders, there is scope within the legislation for non- stakeholders to raise whistleblowing concerns. This may include customers, partners, members of the congregation or other persons with an association to us.

Members of the public may also feel they wish to pursue a matter they feel is in the public interest.

The procedure will not differ from that of a stakeholder's.

9. Handling the disclosure

On receipt of the disclosure, a meeting to discuss the concerns will be offered and held within a reasonable period. The meeting will be held in a confidential and private location and the following persons will be present:

- The stakeholder raising the concern
- the Appropriate Person to whom the concern has been raised

This meeting will be of an exploratory nature depending on the nature of the concern and the stakeholder can bring along someone to accompany them.

The individual will have the opportunity to detail the reasons for their disclosure and will use the meeting to share concerns; and share any supporting facts with the appropriate person chairing the meeting.

The Appropriate Person will make a formal note of the meeting, which is shared with the whistleblower within an agreed timeframe.

The Appropriate Person will then notify the Vicar and PCC Secretary (unless one or both is implicated) that a whistleblowing disclosure has been made, and conduct the investigation.

The identity of the whistleblower will be protected throughout this process.

The Appropriate Person will, having considered all the information presented, then agree with the individual the likely course of action in terms of next steps or remedying the situation and agree timescales for action.

Once the meeting has taken place the Appropriate Person to whom the disclosure was made will consider the information and decide whether there is a case to answer or whether an investigation should be conducted to establish the facts, who will undertake the investigation and what form it should take.

The Appropriate Person to whom the stakeholder initially makes the disclosure will, unless the stakeholder is advised otherwise, act as the main point of contact in the matter and will be responsible for keeping the stakeholder up-to-date on the outcome of investigations carried out and any actions taken as a result of the investigation.

If, following the meeting, the Appropriate Person to whom the disclosure is made decides not to proceed with an investigation, this decision will be explained as fully as possible to the complainant. It is then open to the complainant to appeal against the outcome to the whole PCC.

Whistleblowing incidents will be recorded on a central register by the Appropriate Person which outlines the date of the incident and who the Appropriate Person is.

On the occasion that the Appropriate Person leaves / stands down, their records must be shared with the PCC Secretary or the Area Dean.

10. External Disclosure

It is hoped that this procedure will provide stakeholders with the assurance they need to raise whistleblowing issues with Holy Trinity church internally. However, we accept that there may be circumstances where stakeholders feel it is more appropriate to make the disclosure to an external body. This is known as a ‘Public Disclosure’.

An external body may be non-regulatory; such as an MP or the police. Or, alternatively may be regulated, in which case, the disclosure can be made to ‘prescribed’ persons should the malpractice fall within that body’s regulatory remit.

The disclosure will be protected under the legislation in the same way as a disclosure made internally as long as it meets the same satisfying conditions.

A full list of prescribed persons and bodies can be found in the schedule to the Public Interest Disclosure (Prescribed Persons) Order 1999 (SI 1999/1549).

In the event of an external disclosure the relevant regulatory or non-regulatory body will carry out investigations as necessary and to the procedures and processes set out by them.

11. Anonymous disclosure

The identity of the individual raising the disclosure will be kept confidential, if so requested, for as long as possible, provided that this is compatible with a proper investigation.

In view of the protection afforded to an individual raising a genuine concern, it is considered desirable that they disclose their name. However, there may be special or unusual circumstances where an individual considers it necessary to make an anonymous disclosure.

Where an anonymous disclosure occurs, the disclosure will be accepted and treated equally with those bearing a name. Anonymous claims can at times be more difficult to investigate as there is not the option to seek further information during investigation, and claimants cannot be contacted to discuss the outcome.

However this should not act as a barrier to making an anonymous disclosure if the individual feels that this is the best course of action for them.

12. Disclosure to the media

It is advised that internal procedures surrounding whistleblowing should be followed before any disclosures to the media are made. External disclosures made that have not first followed internal procedures may be considered an unreasonable action under PIDA (see Appendix I) and can potentially lead to disciplinary proceedings.

If you feel that your concern is not being dealt with properly through our internal Whistleblowing procedures, we recommend seeking legal advice.

13. Issuer

This policy has been issued and approved by the Parochial Church Council of Holy Trinity Church, Twickenham. It is reviewed every two years.

Version control				
Version number	Date	Author	Status	Review
1	7 Feb 2023	Tim Little	Draft	Mar 2025

