

DOP E7

Whistleblowing policy

Commitment

- 1.1 The Diocesan Trustees are committed to ensuring the work of the diocese is carried out with honesty and integrity, and expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur
- 1.2 The aims of this policy are:
- (a) To encourage clergy, staff and other personnel to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
 - (b) To provide clergy, staff and other personnel with guidance as to how to raise those concerns; and
 - (c) To reassure clergy, staff and other personnel that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.
- 1.3 This policy applies to all clergy, employees, volunteers, trustees, and all those working with or for the diocese.

Definitions

- 2.1 ***Whistleblowing*** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
- (a) criminal activity;
 - (b) miscarriages of justice;
 - (c) danger to health and safety;
 - (d) damage to the environment;
 - (e) failure to comply with any legal or professional obligation or regulatory requirements, including those issued by the Charity Commission;
 - (f) bribery;

- (g) financial fraud or mismanagement;
- (h) negligence;
- (i) breach of our internal policies and procedures;
- (j) conduct likely to damage the reputation of the diocese;
- (k) unauthorised disclosure of confidential information;
- (l) the deliberate concealment of any of the above matters.

2.2 A ***whistleblower*** is a person who raises a genuine concern in good faith relating to any of the above. If any individual to whom this policy applies has any genuine concerns related to suspected wrongdoing or danger affecting any of the activities of the diocese (a ***whistleblowing concern***) they should report it under this policy.

Raising a whistleblowing concern

- 3.1 The Diocesan Trustees hope that in many cases an individual to whom this policy applies will be able to raise any concerns with their line manager. However, where they prefer not to raise it with them for any reason they should contact the Compliance Officer appointed in accordance with DOP E6 – Anti-Bribery and Anti-Corruption Policy, or the Bishop. Contact details are set out at the end of this policy.
- 3.2 The Compliance Officer will arrange a meeting with an individual who has raised a concern under this policy (the concerned individual) as soon as possible to discuss their concern. The Compliance Officer will arrange for an initial assessment to be carried out to determine the scope of any investigation and will inform the concerned individual of the outcome of that assessment. The concerned individual may be required to attend additional meetings in order to provide further information. The concerned individual should treat any information about the investigation as confidential.
- 3.3 If the concerned individual is not happy with the way in which their concern has been handled, they may contact the Bishop or the external auditors of the diocese. Contact details are set out at the end of this policy.

Confidentiality

- 4.1 The Diocesan Trustees do not encourage clergy, staff and other personnel to make disclosures anonymously. Proper investigation may be more difficult or impossible if the Diocesan Trustees cannot obtain further information from the concerned individual. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Compliance Officer and appropriate measures

can then be taken to preserve confidentiality. If the concerned individual is in any doubt they can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

External disclosures

- 5.1 The law recognises that in some circumstances it may be appropriate for an individual who has concerns to report them to an external body such as the Charity Commission. It will very rarely if ever be appropriate to alert the media. The Diocesan Trustees strongly encourage any individual who has concerns to seek advice before reporting a concern to anyone external.
- 5.2 Whistleblowing concerns usually relate to the conduct of our clergy, staff and other personnel, but they may sometimes relate to the actions of a third party, such as a sponsor, supplier or service provider. The law allows an individual who has concerns to raise a concern in good faith with a third party, where they reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, the Diocesan Trustees encourage any individual who has concerns to report such concerns internally first. Any individual who has concerns should contact their line manager or the Compliance Officer for guidance.

Protection and support for whistleblowers

- 6.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. The Diocesan Trustees aim to encourage openness and will support clergy, staff and other personnel who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 6.2 However, if the Diocesan Trustees conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action or termination of any contractual or other relationship.
- 6.3 Clergy, staff and other personnel must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an individual believes that they have suffered any such treatment, they should inform the Compliance Officer immediately.
- 6.4 Clergy, staff and other personnel must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action, or termination of any contractual or other relationship.

Responsibility for the success of this policy

- 7.1 The Diocesan Trustees have overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 7.2 The Compliance Officer has day-to-day operational responsibility for this policy.
- 7.3 All clergy, staff and other personnel are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

Interpretation

- 8.1 In this policy a reference to the Bishop includes another person for the time being having episcopal jurisdiction in the Roman Catholic Church over Roman Catholics in the City and Diocese of Portsmouth (including a Diocesan Administrator).

Contacts

Compliance Officer	The Revd Mr Stephen Morgan 023 9282 5430 s.morgan@portsmouthdiocese.org.uk
The Bishop	The Right Reverend Philip Egan 02392820894 bishop@portsmouthdiocese.org.uk
External auditor	haysmacintyre (Adam Halsey) 02079695657 ahalsey@haysmacintyre.com
Public Concern at Work (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk