

## EDBF DIGNITY AT WORK

### DISCLOSURE OF PUBLIC INTEREST MATTERS POLICY (Whistleblowing)

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|-----------------------------|---|
| Approver                    | Diocesan Secretary  |
| Owner(s)                    | Director – People and Safeguarding<br>Diocesan Secretary – Whistleblowing Officer<br>Manager – Operations   |
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| Related Documents           |   |
| Location of Electronic Copy | <ul style="list-style-type: none"> <li>• PeopleHR</li> <li>• 'H' Drive: 2023 Policies Folder</li> </ul>   |
| Scope                       | <p>This Policy applies to all EDBF and EDPS Ltd employees plus those individuals identified in paragraph 2. EDBF reserves the right to amend this policy at its discretion at any time. It does not form part of any employees' contract of employment with EDBF.</p> <p>Where EDBF is referred to in this policy, it is used as an umbrella term for both EDBF and EDPS Ltd.</p> |
| Extensions                  | Individuals identified in Paragraph 2.  |
| Exclusions                  | None  |



# Disclosure of Public Interest Matters Policy

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## 1. Policy Statement

We are committed to conducting the work and responsibilities of EDBF with honesty and integrity, and we expect all employees 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.

In addition, as an organisation involved with the provision of services for, and works with, children and/or vulnerable adults we are required to have appropriate whistleblowing procedures that fulfil our commitment to safeguard and promote the welfare of children and vulnerable adults. As such we are committed to maintaining a culture that enables issues about safeguarding and promoting the welfare of children and vulnerable adults to be addressed.

Whistleblowing therefore applies to situations such as those covered by this document, namely unacceptable practice, performance or behaviour in situations which may or may not be related to children or adults who may be vulnerable, and in all cases the same principles can be applied.

The Public Interest Disclosure Act 1998 gives workers legal protection against being dismissed or penalised as a result of disclosing certain serious concerns. Whilst the Act does not provide the same protection for volunteers, EDBF wants to adopt the same approach in their protection.

The aims of this policy are:

- To ensure EDBF employees are encouraged to acknowledge their individual responsibility to bring matters of unacceptable practice, performance or behaviour to the attention of their manager, the People Team or the Diocesan Secretary.
- To encourage employees 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.
- To provide employees with guidance as to how to raise those concerns.
- To reassure employees they are able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

In the event that this policy and the law conflict, the law shall take precedence. If employees are in any doubt as to what their rights are, they are to discuss matters with their manager. If this policy changes as a result of amendments in the law, the changes will be notified to the employee via their manager.



No one will be subjected to any detriment for reporting or raising a formal matter of public interest (whistleblowing) in accordance with this policy where the concern is genuine (even if it turns out to be a mistake).

All matters relating to an employee's concern whether informal or formal, will be treated as confidential.

You and anyone accompanying you (including witnesses) to any meetings or hearings conducted in accordance with this policy must not make electronic recordings of any such meetings or hearings.

This policy does not form part of your contract of employment, and it may be amended at any time.

## 2. Who is Covered by the Policy?

This policy is intended to apply to all employees of the Exeter Diocesan Board of Finance (hereafter referred to as EDBF) including full-time, part-time and fixed-term employees plus consultants, contractors, trainees, trustees and authorised volunteers whose conduct may affect the work of the diocese and impact EDBF's reputation. This policy also applies to all employees of EDPS Ltd.

It is intended that casual and agency staff and volunteers when they are considered to be undertaking activities and duties authorised by EDBF or in a capacity viewed as officially representing EDBF also adhere to this policy. In such cases, the individuals will be made aware of this policy by their official supervisor.

## 3. What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- Criminal activity.
- Miscarriages of justice.
- Danger to health and safety.
- Damage to the environment.
- Failure to comply with any legal or professional obligation or regulatory requirements.
- Negligence.
- Safeguarding concerns.
- The deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under



this policy. If your concerns relate to your manager, you should raise your concerns with the Diocesan Secretary or the Director of People and Safeguarding (HR). This policy is not to be used for complaints relating to your own personal circumstances, such as the way you have been treated at work.

In those cases, you should use the Grievance Procedure or Anti-Harassment and Bullying Policy as appropriate.

If you are uncertain whether something is within the scope of this policy, you can seek advice from the Director of People & Safeguarding or the Diocesan Secretary who may choose to refer you to a member of the Senior Management Team.

#### 4. Reasons for Whistleblowing

It is often the case that a co-worker or co-voluntary worker may be the first to recognise that something is wrong. Some of the reasons for whistleblowing are to prevent the problem worsening or widening, to protect or reduce risks to others, or to prevent themselves from becoming implicated.

However, taking the decision to blow the whistle on an individual or an organisation can be a difficult one. People may feel unwilling to take the first step of reporting an issue because of a fear of starting a chain of events which spiral out of control, disrupting the work of the organisation, team or project, fear of getting it wrong, fear of the repercussions or damaging careers or reputations and the fear of not being believed.

#### 5. Raising a Whistleblowing Concern

We hope that in many cases you will be able to raise any concerns with your manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Diocesan Secretary.

We encourage all employees to:

- Voice any concerns, suspicions or uneasiness about the practice or behaviour of an individual as soon as possible.
- Be specific about what practice is concerning, what has been heard or what has been observed.
- Ideally put concerns in writing, outlining the background and history, and providing dates and times.
- Provide as many facts as possible; do not rely on rumour or opinion.



However, where the matter is more serious, or you feel that your manager has not addressed your concern, or you prefer not to raise it with them for any reason, you are to contact one of the following:

- Director of People and Safeguarding.
- Diocesan Secretary.
- Chairman of the Board

You are encouraged to put your name to any disclosure. However, any concern raised anonymously will be considered at the discretion of the person to whom the disclosure is made, taking into account the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from attributable sources.

If the matter concerns either of the Diocesan Secretary or the Chairman of the Board, you should contact the other of the holder of these posts. If this matter concerns both the Diocesan Secretary and the Chairman of the Board, you are to contact any other Board Member.

If the concern is about a practice, performance or behaviour which relates to the safeguarding of children or adults who may be vulnerable, contact the Director of People and Safeguarding, or the Diocesan Safeguarding Adviser or the Diocesan Secretary and it will be investigated according to the Diocesan Safeguarding procedures.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter. You are not expected to prove the truth of a concern or investigate it.

Within the bounds of confidentiality, you will be given as much information as possible on the nature and progress of any enquiries,

You will be provided with appropriate support to ensure that you are not harassed or victimised.

No action will be taken against you if the concern was raised in good faith and yet proves to be unfounded.

Malicious allegations will be considered very seriously and may result in disciplinary action being taken against you.



## 6. Confidentiality

We hope that you will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage you to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible and genuine.

Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to the Diocesan Secretary and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. The contact details are at the end of this policy in point no 11.

## 7. External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, *Public Concern at Work*, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a supplier or service provider. The law will protect you in some circumstances if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your manager or one of the other individuals set out in point no 10 for guidance.

## 8. Investigation and Outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.



In some cases, we may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistle-blower has made false allegations maliciously, the whistle-blower will be subject to disciplinary action.

## 9. If you are not Satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in point no 10. Alternatively, you may contact the Chairman of EDBF or our external auditors. Contact details are set out at the end of this policy.

## 10. Protection and Support for Whistle-blowers

It is understandable that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken.

You 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 you believe that you have suffered any such treatment, inform the Diocesan Secretary immediately. If the matter is not remedied, raise it formally using our Grievance Procedure.

Employees must not threaten or retaliate against whistle-blowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

## 11. Responsibility for the Success of this Policy

EDBF board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Whistleblowing Officer has day-to-day operational responsibility for this policy and must ensure that all managers and other employees who may deal with concerns or investigations under this policy receive appropriate training.





You are responsible for the success of this policy, and you should ensure that you use it to disclose any suspected danger or wrongdoing. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Diocesan Secretary.

## 12. Contact Details

Whistleblowing Officer: Diocesan Secretary – Stephen Hancock

The Old Deanery  
The Cloisters  
Exeter EX1 1HS  
Tel 01392 294927

[stephen.hancock@exeter.anglican.org](mailto:stephen.hancock@exeter.anglican.org)  
[www.exeter.anglican.org](http://www.exeter.anglican.org)

If your concern is in relation to the Diocesan Secretary, then please address any correspondence to the Chair of the Exeter Diocesan Board of Finance and send to the above address.

Public Concern at Work (independent whistleblowing charity) Helpline: 020 3117 2520; email: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk); website: [www.pcaw.org.uk](http://www.pcaw.org.uk)