

The Diocese is committed to the highest standards of openness, morality, integrity and accountability in all its activities and to ensuring that no individual should feel at a disadvantage in raising legitimate concerns.

Whistleblowing is when someone raises a concern about a dangerous or illegal activity or any wrongdoing within their organisation. Raising a concern is known as "blowing the whistle" and is a vital process for identifying risks to people's safety, legal breaches, considerable misconduct, malpractice, improper or immoral activity impacting on others.

The Diocese of Portsmouth recognises that the decision to blow the whistle can be a difficult one to make, not least because of the fear of repercussion from those responsible for the failure or malpractice.

The aim of this policy is to encourage the disclosure of wrongdoing, but it also ensures the protection given to individuals who report malpractice, as provided under the Public Interest Disclosure Act which gives legal protection to workers against being dismissed or penalised by their employer as a result of publicly disclosing certain serious concerns. We therefore welcome our staff members, office holders and volunteers who have serious concerns about any aspect of the Diocese's work to come forward and voice those concerns in confidence.

Whilst voluntary roles are not included within the scope of the Act, the Diocese of Portsmouth encourages volunteers to use this process and adopts the same approach in their protection.

This policy sets out the procedure for individuals who have a reasonable belief that:

- Improper conduct, immoral or unethical behaviour
- A criminal offence
- A miscarriage of justice
- Financial malpractice or impropriety or fraud
- An act creating risk to health and safety
- An act causing damage to the environment
- A breach of any other legal obligation
- The deliberate concealment of any of the above

is being, has been or is likely to be, committed, and summarises how these concerns will be dealt with.

The above list is not exhaustive. Staff members, office holders and volunteers are also encouraged to raise concerns in cases where national and/or diocesan policies and procedures may have been breached.

Personal grievances, complaints of malpractice or impropriety relating to issues of employment are not covered by this policy and should be raised via the appropriate grievance procedure.

## Principles

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- Staff members, office holders and volunteers should be aware of the importance of preventing and eliminating wrongdoing and misconduct within the Diocese, and be watchful for illegal or unacceptable practice or behavior that they become aware of.
- In order to be better able to act and resolve any potential problems before they escalate, the Diocese recognises the importance of raising concerns at an early stage.
- The Diocese does not tolerate victimisation or harassment, and will take action to protect staff members, office holders or volunteers when they raise a concern in good faith.
- Staff members, office holders and volunteers who raise concerns will be given appropriate advice and support, and kept informed of the progress and outcome of any inquiries wherever possible.
- The Diocese encourages individuals to put their name to any disclosures they make. Anonymous disclosures will be investigated as far as reasonably possible; however, it may not always be feasible to provide feedback on outcomes if information is passed on anonymously.
- Malicious or vexatious allegations may lead to a disciplinary process for the individual concerned.

## Procedure

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- Any concerns or disclosures should be raised immediately, or as soon as reasonably practical.
- Where possible disclosures should be made in writing, and include a description of the concern, including any relevant background and context, dates, times, names and venues.
- In the first instance, staff members, office holders and volunteers should raise concerns with their Line manager, or person to whom the person making the disclosure is accountable, i.e., Group Leader, Incumbent, Archdeacon, etc.
- If this is not appropriate, because they may be involved in the alleged wrongdoing, malpractice, illegal acts or omissions in some way, the concern should be raised with the Diocesan Secretary.
- A line manager who is informed by a whistleblower of potential wrongdoing will take immediate action to report the matter to the Diocesan Secretary, and investigate the matter.
- Concerns relating to lay staff or office holders in safeguarding roles within the Diocese should be referred in the first instance to the Deputy Diocesan Secretary.
- Concerns relating to the Diocesan Secretary or the Diocesan safeguarding team should be referred to the Bishop. If the concern relates to the delivery of safeguarding services, the Chair of the Diocesan Safeguarding Advisory Panel (DSAP) should be notified.
- Concerns relating to the Chair of the DSAP should be referred to the Bishop.
- The action taken by the Diocese will depend on the nature of the concern. The matters raised may be subject to, but not limited to:
  - Internal investigation
  - Referral to the statutory authorities (police or social care services)

- Consideration under a disciplinary or grievance procedure
  - Consideration under Canon Law
  - Notification to insurers
  - Notification to the Charity Commission
- All investigations will be conducted as quickly as possible and the concern acknowledged within 5 working days, however, the time taken to complete the investigation will vary depending on the nature of the alleged malpractice. Should the investigation become prolonged, the individual who raised the concern will be notified and kept informed as to the progress of the investigation and when it is likely to be concluded.
  - Whilst it may not always be appropriate to tell the whistleblower the details of any action taken, they will be informed if action is taken. If no action is taken, the reason for this will also be explained.
  - Employees will not be treated unfavorably or suffer any detriment on the grounds that they have made a disclosure, providing that the disclosure has been made in good faith and that the individual reasonably believes that the information in the allegation is substantially true.
  - The Diocese will treat all disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required. If this is the case, the individual will be reassured and reminded that they are protected from detriment when making genuine disclosures in the public interest.
  - A whistleblower should always, in the first instance, talk to the individuals in the above named roles about a potential wrongdoing. However, if they are not satisfied with the response, they are entitled to contact a prescribed external body to express their concerns. The details of prescribed persons or bodies can be found at [www.gov.uk](http://www.gov.uk): Whistleblowing.
  - If the person who raised the allegation is dissatisfied with the outcome of their complaint, they will be given the opportunity to appeal. The outcome of any such appeal will be regarded as final.

## Diocesan Contacts

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Chair of DSAP  
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### **Independent Advice**

Public Concern at Work

The Green House  
244-254 Cambridge Heath Road  
London E2 9DA

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Email: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)

## **Review**

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This policy will be reviewed in September 2022 or more frequently if appropriate.