



WHISTLEBLOWING POLICY¹

1. Overview

1.1 This policy outlines what you should do if you suspect something in the Network is putting you or others in danger or is illegal or unethical.

1.2 This policy applies to all employees, Church members, contractors, consultants, officers, interns, casual and agency workers.

1.3 If you are an employee, this policy does not form part of your employment contract and we may update it at any time.

1.4 The Christ Church Network is committed to the highest standards of openness, probity, and accountability. In line with that commitment, we expect employees and others with serious concerns to come forward and voice those concerns and to do so without fear of reprisals.

1.5 This policy is intended to encourage and enable people to raise serious concerns within the Network rather than overlooking a problem or blowing the whistle to the media or other external bodies.

2. What is whistleblowing?

2.1 We aim to maintain high standards of integrity in everything we do. However, all organizations can occasionally be affected by conduct that is dangerous, against the law, or that breaches ethical or professional codes. If you have any such concerns, we encourage you to report them immediately. This is called 'whistleblowing'. We will take your concerns seriously. They will be thoroughly investigated and we will take action to protect you during this process.

2.2 The types of concerns you may want to raise by whistleblowing might include:

- any activity you suspect is criminal
- any activity you suspect puts health and safety at risk
- any activity you suspect may damage the environment
- any activity you suspect might constitute bribery
- any failure to comply with legal or regulatory obligations

¹ The Christ Church Network is the operating name of the Newland Christian Trust: a Christian charity (1101648) and Limited Company (04976143)

- any failure to meet professional requirements
- any attempt to conceal one or more of these activities.

2.3 Speak to your line manager/one of the Elders if you are not sure whether something you have become aware of is covered by this policy. If your complaint is about the way people are behaving towards you, then you should refer to the separate Network Bullying and Harassment policy or the Grievance Policy for guidance on how to proceed.

3. Raising a whistleblowing concern

3.1 In most cases, you should start by raising your concerns with your line manager/one of the Elders (<https://christchurchnewland.org.uk/whoswho.htm>), either face-to-face or in writing.

3.2 If you would prefer not to go to your line manager/one of the Elders, you should write to the Anglican Mission in England (AMiE) Bishop (info@anglicanmissioninengland.org). You should also do this if your concerns are of a very serious nature.

3.3 Your letter should say that you are raising your concerns under this policy and then explain what those concerns are. Include all the key facts, dates, and the names of the people involved.

3.4 The action we take will depend on the nature of the concern. Your concerns may be:

- internally investigated
- referred to the Police
- referred to an external body.

3.5 Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take and who should lead it.

3.6 Concerns or allegations which fall within the scope of other existing policies (for example Safeguarding, Complaints Handling) will normally be referred for consideration under those policies. Some concerns may be resolved by agreed action without the need for an investigation.

3.7 We will write to you within 10 working days to acknowledge receipt of your concern and to inform you of how we propose to respond.

3.8 You may be invited to a meeting to discuss your concerns, and you are entitled to be accompanied at this and any subsequent meetings by a colleague/companion/trade union representative. If you bring a companion, we ask that you both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.

3.9 After the initial meeting, we will investigate your concerns and we may ask you to attend further meetings. To investigate properly, we may involve specialists with particular knowledge or experience of the issues you have raised.

3.10 We will keep you informed in general terms about how the investigation is progressing and how long it is likely to take. We may not be able to give you details about the investigation

(or any action it leads to) as we need to protect confidentiality and comply with legal obligations. We understand this may be frustrating, and so we will do our best to reassure you that things are in hand and to explain why we are acting in the way we are.

3.11 Your concerns will be addressed fairly, but we cannot guarantee the outcome of the investigations will be the one you want. If you are not satisfied with how we have conducted the investigations, you can take the matter to AMiE Bishop for further consideration (info@anglicanmissioninengland.org).

3.12 Most concerns are raised with good intentions, but occasionally someone makes a false allegation out of malice or because they believe they have something to gain. Any employee found doing this will face action under the Network Disciplinary policy and is at risk of being dismissed for gross misconduct.

4. Confidentiality and anonymity

4.1 There is a significant difference between wanting to keep your concerns confidential and making a disclosure anonymously. The Network actively discourages anonymous whistleblowing. Concerns raised anonymously are very difficult — and sometimes impossible — to investigate. We cannot properly establish whether allegations are credible without being able to ask you for more details or for clarification, and this makes it hard to reach an informed decision. This is why we urge you not to report matters anonymously.

4.2 We will do our best to protect your identity if you do not wish your name to be disclosed. It must be appreciated, however, that the investigation process may reveal the source of the information and disclose your identity to people involved in the investigation. A statement by you may be required as part of the evidence.

4.3 You are protected from reprisals under this policy (see paragraph 5), but if you are still worried, talk to us. We will explore how far we can go in keeping your concerns confidential.

5. How we protect whistleblowers

5.1 People who think there might be something seriously wrong in an organization might not express their concerns because they feel that speaking up might be disloyal to their colleagues or the organization. They may also fear harassment or victimization.

5.2 The Network will not tolerate harassment or victimization and will take action to minimize any difficulties staff/others may experience as a result of raising a concern in good faith.

5.3 If you raise a genuine concern under this policy, we will support you fully even if we find through our investigations that you made a mistake or that there has been no breach of policy, legal obligation or other activity set out in paragraph 2.2 above. However, if you feel you have been treated badly as a result of raising a concern, you must tell us straightaway. First inform your line manager/one of the Elders and, if the matter remains unresolved, you must follow the formal process outlined in the Network Grievance Policy.

5.4 All whistleblowers are given the same protection, so you must not threaten or otherwise badly treat others who have raised concerns under this policy. If you do, you may

face disciplinary action which could include dismissal for gross misconduct (if an employee). The whistleblower may also be able to bring legal action against you.

5.5 You can get further advice on whistleblowing, protecting confidentiality, and being protected from reprisals at <https://protect-advice.org.uk> Protect is an independent charity offering advice and support to individuals who are raising concerns. They also work with organisations to offer support and training. Their helpline number is 020 3117 2520.

6. Taking your concerns outside the Network

6.1 This policy outlines the process for raising, investigating, and resolving wrongdoing within Christ Church Network. As outlined in paragraph 1.4, the Network is committed to high standards of openness, honesty and accountability and its desire is to investigate any allegation of whistleblowing internally before anyone outside the Network becomes involved (excepting the guidance in paragraph 3.2).

6.2 In some exceptional circumstances, you may need to go to an external body, for example the Anglican Network in Europe or Thirty One Eight. The independent charity Protect (see paragraph 5.5) can direct you towards the appropriate external body for the type of issue you want to raise.

6.3 This policy covers the actions of third parties such as suppliers, service providers, and clients, as well as our staff and Church members. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. Your manager/one of the Elders will be able to explain how you should proceed.

6.4 Alerting the media to a concern — particularly before or during an internal investigation — is almost never justified or appropriate in any situation. We strongly discourage you from doing so and will treat any contact with the press as a serious disciplinary issue (if an employee) justifying dismissal unless exceptional circumstances exist. We would normally expect you to be guided by this policy and to have taken all reasonable steps to deal with the matter internally or with an external body, and to have taken full advice from a lawyer or from Protect before being justified in approaching the press.

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