



THE PAROCHIAL CHURCH COUNCIL'S

WHISTLE-BLOWING POLICY

1. Introduction

1.1 Whistle-blowing has been recognised as having an important place in developing a strong accountability culture within St Andrew's Kingsbury. At the simplest level, anyone can spot a genuine concern and it is important that everyone who does so at St Andrew's Kingsbury, feels safe to raise that concern. At a more fundamental level, organisations, including the church, can become hierarchical and opaque, and a strong whistle-blowing policy recognises the importance of empowering those who may not hold positions of structural influence within the organisation to feel confident enough to speak out, should they believe poor practice to be present at St Andrew's Kingsbury.

1.2 To have confidence in our honesty and integrity, this policy aims to provide a supportive process that encourages and enables Parishioners or Workers to raise concerns about misconduct within St Andrew's Kingsbury, without repercussion and will give them confidence that their concerns will be properly investigated and resolved in a timely manner.

2. Legal and Policy Impact

2.1 This policy considers the following legislation:

- Human Rights Act (1998)
- Public Interest Disclosure Act (1998)
- Employment Rights Act (1996) sections 44 and 100

2.2 The aim of this policy and associated guidance is to provide a clear and transparent way for anyone involved in this parish to raise genuine concerns regarding poor practice that impacts upon These principles and aims are delivered through integrity, this means being honest and transparent in what we do and say, and accepting responsibility for our individual and collective actions. It is expected that those working for, and representing St Andrew's Kingsbury shall act with integrity. St Andrew's Kingsbury shall be a Church that acts with integrity and honesty. In order for Parishioners concerned about their terms and conditions of work, their working relationship with St Andrew's Kingsbury, or how a concern they raised was addressed, they are encouraged to use St Andrew's Kingsbury's complaints Procedure.

2.3 In the event that a Parishioner or worker feels they are being bullied or harassed in the Church either blowing the whistle, or for any other reason they are encouraged to refer to the Complaints Procedure.

2.4 The St Andrews website outline the Church's Christian Principles and Values. All workers are expected to operate within these and where there is reasonable evidence that these are not being followed it will be addressed by the Priest and Churchwarden(s).

2.5 Similarly, if a Parishioner or Worker is found to have raised a complaint or a false allegation for malicious reasons, they will be disciplined, steps may be taken to terminate their relationship with St Andrew's Kingsbury.

3. Scope of the Policy

3.1 This policy applies to all Parishioners, contractors/consultants and agency workers, trustees, interns, volunteers or those on work-placement working on behalf of St Andrew's Kingsbury. Throughout the document, the term "worker" will apply to collectively define these groups

4. St Andrew's Kingsbury's policy on Whistle-blowing

4.1 St Andrew's Kingsbury's policy on whistle-blowing has the following objectives:

- To provide direction to all Parishioners and Workers on what is unacceptable practice within St Andrew's Kingsbury, and to provide a safe and secure environment to blow the whistle on unacceptable practice.
- To protect Parishioners and workers who raise a concern in good faith and who have a reasonable suspicion that the alleged malpractice has occurred, is occurring, or is likely to occur.
- To provide reassurance to those Parishioners and Workers who raise concerns in good faith and with reasonable suspicion that they will not experience any repercussions for doing so.

4.2 This policy aims to make Parishioners and workers aware of their rights and responsibilities with regard to up-holding the values and standards of practice at St Andrew's Kingsbury and how to raise concerns when these standards of practice are not up-held.

4.3 Whilst this is not an exhaustive list, malpractice would include the following:

- A criminal offence, including theft, fraud or corruption.
- A failure to comply with a legal obligation, (including but not limited to those under the Charity Commission or financial regulations).
- A miscarriage of justice.
- Accepting gifts which are intended to influence decision making.
- The endangering of an individual's health and safety, and well-being: this would include towards Parishioner, worker or visitor to St Andrew's Kingsbury.
- Damage to the environment or conduct which conflicts with St Andrew's Kingsbury's interests.
- Deliberate disregard or serious breach of St Andrew's Christian Principles and Values, including bullying and harassment, and discrimination.
- Deliberate concealment of information to any of the above. The behaviour that gives rise to the concern does not have to take place in the UK.

5. Responsibilities

5.1 The PCC is accountable for ensuring the effective implementation of this policy throughout St Andrew's Kingsbury and representing St Andrew's Kingsbury's interests/concerns in the event of publicity or litigation resulting from a whistle-blowing allegation.

5.2 The PCC are responsible for ensuring that the principles of this policy are communicated and understood throughout their teams. They are also responsible for putting the policy into practice.

- Ensuring that all concerns raised by Parishioners and Workers are taken seriously where appropriate.
- Ensuring that concerns are investigated properly, objectively and in a timely manner.
- Ensuring that the Parishioner and Worker is kept informed of progress.
- Ensuring that action is taken to resolve the concern

6. How to raise a concern

6.1 In the event that they suspect malpractice Parishioners and Workers at St Andrew's Kingsbury have a responsibility to inform the Priest or the Churchwarden(s) who is able to do something about the problem. They must provide details about the malpractice immediately they become aware. All attempts should be made to raise the concern internally in the first instance. Please see the Complaints Procedure.

APPENDIX A

A1. Parishioner and Worker Guidance on whistle-blowing:

A1. Determining whether to use the Whistle-blowing Policy

A1.1 This quick question section may help you to determine whether you should use the whistle blowing procedure.

A1.2 Does the malpractice fall under one of the following?

- A criminal offence, including theft, fraud or corruption.
- A failure to comply with a legal obligation, namely those under the Charity Commission or financial regulations.
- A miscarriage of justice.
- The endangering of an individual's health and safety, and well-being: this would include towards Parishioner, Worker or visitor to St Andrew's Kingsbury.
- Damage to the environment or conduct, which conflicts with St Andrew's Kingsbury's interests.
- Deliberate disregard or serious breach of St Andrew's Kingsbury Christian Principles and Values, including bullying and harassment, and discrimination.
- Deliberate concealment of information to any of the above.

A1.3 Do you have genuine reason to believe that malpractice occurred either in the past, recently, or is likely to occur in the near future?

A1.4 What details do you have? Check that the details are not judgements or assumptions, but based on fact.

A1.5 Do you feel vulnerable or at risk?

A2. Letting someone know:

A2.1 As soon as you become aware of, or have good reason to believe that, malpractice either has occurred, is occurring or likely to occur by Parishioner, Worker, Volunteer or Contractor within St Andrew's Kingsbury raise your concern with an appropriate member of The PCC of St Andrew's Kingsbury. In the first instance, this would normally be the Churchwarden(s) or the Priest. You can make a report either orally or in writing.

A2.2 If the malpractice concerns the Priest or the Churchwarden(s), then raise your concern with the PCC.

A2.3 If you believe the malpractice is within the structure of the PCC, then raise your concern with the Archdeacon of Northholt, who will consider in discussion with the Bishop and the Diocese how it will be investigated.

A2.4 If the malpractice is regarding health and safety, raise your concern with the Churchwarden(s), who has/have the responsibility for health and safety matters within St Andrew's Kingsbury. It is also advisable to inform the Priest.

A2.5 If you genuinely believe that you will be subjected to detrimental treatment if you report the concern to an appropriate person within St Andrew's Kingsbury, or that making a disclosure to someone within St Andrew's Kingsbury will result in destruction or concealment of evidence relating to the concern, or you believe that your concern was not dealt with satisfactorily by St Andrew's Kingsbury, you may raise your concern with an external body. (Details can be found in the bibliography).

A3. Providing details about your concern:

A3.1 As soon as you become aware of or suspect malpractice, you have a duty to inform an appropriate person of your concern. If it is later found that you were aware of malpractice and had withheld information, this may have serious consequences for you.

A3.2 When reporting your concern, you will be required to give your name, your position, and details about the concern, including any evidence that you have to support the concern. This will enable the best possible investigation.

A4. Your position:

4.1 If you want to raise the matter in confidence please make this clear when you make the report so that the appropriate arrangements can be made. Alternatively, you may make a report anonymously but please note that it is much harder (and sometimes impossible) to investigate suspicions without having direct access to the individual who raised the concern. It is best to declare your identity if possible.

A4.2 If you genuinely believe that malpractice has occurred, is occurring or likely to occur, St Andrew's Kingsbury will ensure that you do not suffer any disadvantage in the Church as a consequence of raising your concern. Unless the concern is easily resolved, if the concern is about the behaviour of an adult in the church, you must follow the policy '[Managing Allegations in the Church](#)'.

A4.3 If you raise a concern which is later found that you knew to be false and / or raise a concern out of malice, then disciplinary action will be taken and may result in your expulsion from the Church. For those who the disciplinary process does not apply (for example contractors/consultants), steps will be taken to terminate the relationship with St. Andrew's Kingsbury.

A5. Next steps:

A5.1 The concern will be investigated by the person to whom it is raised. All Parishioners and Workers called upon to assist the investigation will have a duty to co-operate and may request that their concerns are treated in confidence: again such wishes will be respected.

A5.2 The investigating Person(s) will provide regular information to the Parishioner or Worker who raised the concern on the progress of the investigation up until an outcome has been reached. Please note that this does not necessarily mean that the outcome of the investigation will be divulged to the Parishioner or Worker, especially when relating to the privacy of another individual.

A5.3 The investigating Person(s) will forward all original investigation material to the PCC for further action as appropriate and/or storage.

A5.4 The investigating Person(s) will monitor and ensure that appropriate steps are taken to address the cause for concern.

A5.5 St Andrew's Kingsbury will respect and heed any legitimate concerns about your own safety or career, and will seek not to disclose your identity without your express consent. Any attempt to victimise a Parishioner or Worker for having raised a concern about malpractice, or to deter anyone from raising such a concern, is a serious disciplinary offence.

A5.6 We will do everything possible to keep your identity secret (if you so wish) but there may be circumstances when you may be needed as a witness (for example, if your report becomes the subject of a criminal investigation). Should this be the case, we will seek to discuss the matter with you at the earliest opportunity.

APPENDIX B

External Sources of Information and Advice:

Whilst this is not an exhaustive contact list, it aims to provide the key contacts in relation to St Andrew's Kingsbury's Church.

The Charity Commission for England & Wales matters in respect of the proper administration of charities and funds given or held for charitable purposes.

Charity Commission
Liverpool Head of Operations
2nd Floor
20 Kings Parade
Queens Dock
Liverpool, L3 4DQ
Tel: 0870 333 0123
Fax: 0151 703 1556

Chief Executive of the Criminal Cases Review Commission for actual or potential miscarriages of justice:

Criminal Cases Review Commission
Alpha Tower
Suffolk Street
Queensway
Birmingham, B1 1TT
Tel: 0121 633 1800
Fax: 0121 633 1804
Email: info@ccrc.gov.uk

The Commissioners for Her Majesty's Revenue & Customs Value added tax, insurance premium tax, excise duties and landfill tax. The import of prohibited or restricted goods. Income tax, corporation tax, capital gains tax, petroleum revenue tax, inheritance tax, stamp duties, national insurance contributions, statutory maternity pay, statutory sick pay, tax credits, child benefits, collection of student loans and the enforcement of national minimum wage.

Her Majesty's Revenue & Customs
Cross Cutting Policy
Room 1E/04
1 Parliament Street
London, SW1A 2BQ
Tel: free phone 0900 595 000
Fax: free fax 0800 523 0506
Email: customs.confidential@hmrc.gov.uk

Health & Safety Executive matters which may affect the health and safety of any individual at work; matters which may affect the health and safety of any member of the public arising out of, or in connection with, the activities of persons at work.

Health & Safety Executive
Information Services
Caerphilly Business Park
Caerphilly
South Wales, CF38 3GG
Tel: 0845 345 0055
Fax: 0845 408 9566
Email: hse.infoline@natbrit.com

The compliance with the requirements of legislation relating to data protection and to freedom of information. *Data protection legislation regulates the processing of information relating to individuals, including the obtaining, holding, use of or disclosure of such information. *Freedom of information applies to public authorities about disclosure of information that they hold.

The Office of the Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire, SK9 5AF
Tel: 01625 545700
Fax: 01625 524510
Email: mail@ico.gsi.gov.uk

Recognising that Parishioners and Workers have a lot at stake when considering whether to and how to blow the whistle can seek independent advice from Public Concern at Work. Its website: www.pcaw.co.uk

This policy was adopted by the PCC: *draft version*
Review Date: tbc

PCC of ST ANDREW'S KINGSBURY
Charity Registration Number 1166287