



## THE PAROCHIAL CHURCH COUNCIL OF THE ECCLESIASTICAL PARISH OF COMBE DOWN, BATH

### Whistleblowing Policy and Procedure

THE PAROCHIAL CHURCH COUNCIL OF THE ECCLESIASTICAL PARISH OF COMBE DOWN, BATH (Combe Down PCC) is committed to the highest possible standards of integrity and recognises that clergy, lay staff and volunteers are often the first to become aware of or identify serious disclosures of public interest. Therefore, in accordance with the Public Interest Disclosure Act 1998 (the 'Act'), the Combe Down PCC welcomes everyone who has a serious disclosure about any aspect of the Church's work to come forward and voice those concerns in confidence without fear of reprisals.

### What is Whistleblowing?

Whistleblowing is the name given to the act of the disclosure of information to the PCC or the relevant authority by an individual who knows, or suspects, that another individual or a group of individuals within the PCC is responsible for or taken part in some wrongdoing. Certain disclosures are prescribed by law as 'qualifying disclosures'. A 'qualifying disclosure' means a disclosure of information that the person genuinely and reasonably believes is in the public interest and shows that the PCC has committed a 'relevant failure' in any of the areas mentioned above. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. For example, it includes the cases when:

- the law may have been broken
- PCC policies and procedures may have been breached
- there are disclosures of a safeguarding nature.

### Principles

This policy is based on the following fundamental principles:

- Everyone has the right to raise disclosures about perceived unacceptable practice or behaviour that is not within the public interest.
- The disclosures can be made about acts that have taken place in the past, present of future, e.g., if it relates to the environmental damage that has happened, is happening or is likely to happen.
- The person making the disclosure must reasonably believe that the disclosure is 'in the public interest'.
- We commit to protecting everyone who raises a disclosure in good faith against potential victimisation or harassment.



- We will endeavour to protect the identity of any individual who raises a whistleblowing disclosure and wishes to remain anonymous. However, in certain circumstances, such as any inquiry arising from the disclosure, the individual may be required to provide a signed statement. In certain circumstances the PCC may have to disclose the identity of the individual without their consent, for example where there is risk to others involved or this is a safeguarding disclosure. The reasons for this will be discussed with the individual.
- Everyone who raise disclosures will be given appropriate advice and support and kept informed in relation to the progress and outcome of any inquiries.
- Any malicious or vexatious allegations may lead to a disciplinary process for the individual concerned.

### **How to raise a disclosure – procedure**

It is recognised that there are difficulties in raising a disclosure about the behaviour of a colleague/volunteer. However, raising the disclosure at an early stage may protect others, prevent the problem getting worse, and prevent individuals themselves becoming implicated. All disclosures reported will be treated in the utmost confidence.

Any safeguarding whistleblowing disclosure that cannot be dealt with using the usual procedure for responding to safeguarding concerns or allegations, should be made to The Operations Manager Liz Hume on 01225 835 835.

In the first instance,

- If it is **not** a safeguarding whistleblowing matter, please contact the incumbent or a warden. If that is not appropriate, then contact the Diocese Bath and Wells Diocesan Safeguarding Adviser – 01749 685135 or 07834 514842
- For safeguarding matters, follow the safeguarding policy. (Please raise the concern with Viv Quick as the Parish Safeguarding Officer at Holy Trinity Church – 07914 422225 or 01225 723293 – or email at [safeguarding@htcd.church](mailto:safeguarding@htcd.church). Catherine Winchcombe as the Parish Safeguarding Officer at St Andrew's Community Church – 01225 945 009 (St Andrew's office) during office hours and ask for a call back or email at [safeguarding@stacc.church](mailto:safeguarding@stacc.church). There is no need to give any details to staff).

When reporting a disclosure, you should:

- identify that it is a whistleblowing disclosure;
- detail the background and history of the disclosures;
- give names, dates and places (where possible); and



Holy Trinity  
Combe Down



St Andrew's  
Community Church

- note the reasons why the individual is particularly concerned about the situation.

Following receipt of a disclosure made under this policy and dependent upon its nature, the matter may be:

- investigated internally;
- referred to the Police and / or other statutory agencies;
- independently investigated;
- referred for consideration under the Clergy Discipline Measure; or
- a combination of the above.

When the matter is investigated internally the investigation will aim to gather all relevant information including relevant documentary evidence or witness statements. The timeframe of the investigation will be dependent upon the nature of the disclosure. Once the investigation is complete, you will be informed of the outcome in writing.

If you do not wish to make the disclosure internally or are not satisfied with the outcome of the internal investigation, you should report it direct to the appropriate organisation or regulatory body with authority for that area.