



Whistleblowing Policy

1. Introduction and definitions

The Harrow & Hillingdon Circuit seeks to operate all aspects of business to high standards of conduct and integrity. In the event that a Harrow & Hillingdon Circuit staff member becomes aware of activities that give cause for concern, the Harrow & Hillingdon Circuit has established the following procedure, which provides a framework to allow concerns to be raised in confidence and to allow for a thorough and appropriate investigation of the matter.

The Harrow & Hillingdon Circuit is committed to creating a climate of trust and openness, so that a staff member who has a genuine concern or suspicion can raise the matter with full confidence that it will be appropriately considered and resolved. Any individual who makes a disclosure of wrongdoing or malpractice will be treated with respect and will be protected against victimisation, provided that the staff member had reasonable grounds to suspect the wrongdoing; anyone who victimises a whistleblower will be subject to the Harrow & Hillingdon Circuit's disciplinary procedure.

This policy applies to all Harrow & Hillingdon Circuit staff members, whether permanent or temporary.

What is whistleblowing?

A disclosure made to someone in authority alleging corruption, malpractice or wrongdoing. The act of blowing the whistle is 'making a disclosure in the public interest.' The Harrow & Hillingdon Circuit considers that the following types of activity or behaviour should be dealt with under this policy:

- Manipulation of accounting records and finances
- Inappropriate use of assets or funds of which the Council is the managing trustee
- Decision-making for personal gain
- Any criminal activity
- Abuse of position
- Fraud and deceit
- Serious breaches of procedure, which may advantage a particular party or any actions likely to bring the reputation of the Church into question.

NB: This is not an exhaustive list. For allegations where the report is a complaint rather than information of a wrongdoing, or corruption please refer to the Grievance policy.

2. The Public Interest Disclosure Act 1998

The Public Interest Disclosure Act 1998 provides protection for employees who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in good faith by an employee who has a reasonable belief that:

- a criminal offence (including fraudulent and corrupt behaviour, e.g. theft, fraud or malpractice);
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- concealment of any of the above;

is being, has been, or is likely to be, committed. It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The employee has no responsibility for investigating the matter - it is the organisation's responsibility to ensure that an investigation takes place.

An employee or minister who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because he/she has made a disclosure.

The Harrow & Hillingdon Circuit encourages staff members to raise their concerns under this procedure in the first instance. If a staff member is not sure whether or not to raise a concern, he/she should discuss the issue with his/her line manager or the HR & Development Manager.

3. Procedure

Who to disclose to

The Harrow & Hillingdon Circuit encourages whistleblowers to inform someone with the ability to address the problem. All workers should feel confident about taking the steps to disclose information. The following points will provide some guidance in doing this:

In most cases, staff members should raise any concerns internally. Any matters not covered by the Act or, therefore, this policy, should be dealt with through the Council's Grievance Policy.

In the first instance, discuss any concerns with your line manager. An informal approach to the line manager will be treated in the strictest confidence. It will not result in a report to anyone else without the whistleblower's agreement, except where the line manager believes that the issues raised are so serious that further action may be required. Where this is the case, the line manager will refer it to the HR & Development Manager.

If the staff member feels it is inappropriate to raise the concerns with their line manager, for example if the concerns are about their line manager's actions, or if they are so serious that they should be escalated to someone more senior, then they should speak to the HR & Development Manager. All such approaches will be treated in the strictest confidence. They will not result in a report to anyone else without the whistleblower's agreement, except where the HR & Development Manager believes that the issues raised are so serious that further action may be required. Where this is the case, they will refer it to the Connexional Secretary.

If the whistleblower remains unhappy about the speed or conduct of any further action taken or the way in which their concerns have been resolved, he/she should refer the matter to either the Secretary of the Conference or the Chair of the SRC.

A staff member must not approach individuals involved in his/her disclosure directly or attempt to investigate the matter personally.

Disclosures to the press will not be considered reasonable. They will constitute misconduct and will be treated as a disciplinary matter in accordance with the Council's disciplinary policy.

A potential whistleblower can, at any stage of the above procedure, seek legal advice or speak to Protect for guidance on the helpline 020 3117 2520 or whistle@protect-advice.org.uk.

A potential whistleblower can also contact the Charity Commission if there is an issue that could seriously harm the Harrow & Hillingdon Circuit's staff, volunteers, assets or reputation. However the Charity Commission cannot advise whether a whistleblowing disclosure is protected under the law, or give legal advice.

Dealing with disclosures

If a staff member reports a disclosure, the need for confidentiality will be respected wherever possible, although any concern raised under this procedure will need to be properly documented.

The Harrow & Hillingdon Circuit believes that all staff members should feel able to put their name to the allegations which they raise, as concerns expressed anonymously are difficult to investigate.

The action taken in response to a disclosure will depend on the nature of the concern. By way of example, the matters raised may result in one or more of the following:

- No action required.
- Action being taken under other Harrow & Hillingdon Circuit policies and/or procedures.

- An internal investigation.
- A referral to the police.
- A referral to the Council's external auditors.
- A referral to the Charity Commission.
- An independent enquiry.

The responsible person to whom the disclosure is made will:

- Make a detailed report of the disclosure.
- Ask the staff member to provide a written statement describing the precise nature of the allegations.
- Upon receipt of the written statement, decide whether any further action may be required. Where it is, they will refer it to the HR & Development Manager or the Connexional Secretary and write to the staff member within five working days of making that decision. In their letter, they will acknowledge receipt of the concern, provide information on who it has been referred to and details of who the staff member should contact if they have further questions.

Internal investigation

Where further action is required under this policy in relation to a staff member's concern, this will typically, in the first instance, take the form of an internal investigation. The investigating officer will be the HR & Development Manager or the Connexional Secretary. Alternatively, a suitably qualified independent professional may be asked to undertake the investigation.

During the investigation, the staff member who reported the disclosure may be called upon for interview. They will also be given appropriate updates of progress made during the investigation, whilst bearing in mind the need to respect the confidentiality of other staff members.

There is not a prescriptive procedure for how individual cases should be investigated.

4. Outcomes

- The staff member will be given a prompt and thorough written explanation of the outcome of the investigation and any actions that will result from it.
- The investigating officer compiles a report. The report shall be presented to the Senior Management Meeting. Where the allegation is deemed to be of a serious nature, an appropriate report will be submitted to the Council's Audit Committee.
- The investigating officer will follow through to ensure there have been appropriate outcomes. For example, if the outcome required fire safety equipment and a fire drill test within a given timeframe, the investigating officer should ensure this is done.

The Harrow & Hillingdon Circuit recognises that there may be matters which cannot be dealt with internally and external authorities may need to become involved, including the police and the Charity Commission. Where this is necessary, the Council reserves the right to make such a referral without the reporting staff member's consent.

What if the whistleblower is unsatisfied with the outcome?

- The whistleblower may write to the Secretary of the Conference or the Chair of the SRC within 10 days of receiving written notice of the outcome in order to appeal.
- The Secretary of the Conference or Chair of the SRC will arrange for a panel to meet with the whistleblower and hear the full investigation and the appeal.
- The outcome of the appeal will be the final stage in the internal process and this will be the final decision.
- As part of its risk management monitoring function, the Audit Committee will receive an annual report on the operation of this policy.

Protection of whistleblowers

The Harrow & Hillingdon Circuit will not tolerate any staff member being subjected to a detriment as a result of their making a disclosure in good faith. In the event that any staff member believes that they have been subject to a detriment for this reason, they must inform the Chair of the SRC immediately.

If anyone seeks to discourage a staff member from coming forward to express a genuine concern, the Harrow & Hillingdon Circuit will treat this as a disciplinary matter. In the same way, anyone who criticises or victimises a staff member or otherwise subjects them to a detriment for raising a concern will be dealt with severely.

Unfounded and malicious reports

If it becomes clear that the procedure under this policy has not been invoked in good faith, this will constitute misconduct and shall be treated as a disciplinary matter in accordance with the Council's disciplinary policy.

However, any staff member who, in good faith, makes allegations that turn out to be unfounded will not be penalised for being genuinely mistaken.

5. Conclusion

The Harrow & Hillingdon Circuit is confident that the existing good practice and internal controls will ensure that cases of suspected fraud or impropriety rarely occur. This Whistleblowing Policy is provided as a reference document and a commitment that any concerns raised will be taken seriously and actioned promptly.

Useful links

Protect

Advice line 020 3117 2520 or whistle@protect-advice.org.uk

Government Website

GOV.uk – Whistleblowing

Provides detailed information about:

- Protected disclosures
- Routes of disclosure
- Prescribed persons
- Disclosure in exceptional cases and serious cases.

This policy which is to be reviewed annually was agreed by the Circuit Meeting on **13th September 2023**.



Revd Dr Lynita Conradie
Superintendent Minister