

WHISTLE-BLOWING POLICY & PROCEDURES

Key Points

The Whistle-blowing Policy & Procedure sets out the framework for dealing with allegations of illegal and improper conduct.

Christ Church Purley (the “Organisation”) is committed to the highest standards of transparency, probity, integrity, and accountability.

This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.

This procedure does not replace other policies and procedures such as the Complaints Policy & Procedure, the Grievance & Disciplinary Policy and the Bullying & Harassment Policy and other specifically laid down statutory reporting procedures.

This procedure is intended to ensure that the Organisation complies with its duty under the Public Interest Disclosure Act 1998.

Scope

This procedure applies to all Organisation employees, volunteers and contractors.

It applies to, but is not limited to, allegations about any of the following:

- Conduct that is an offence or breach of the law.
- Alleged miscarriage of justice.
- Serious Health and Safety risks.
- The unauthorised use of public funds.
- Possible fraud and corruption, sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or service users.
- Abuse of authority.
- Other unethical conduct.

Reporting

The Organisation recognises that the decision to make an allegation can be difficult. However, whistle-blowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty to the Organisation and/or to those for whom they are providing a service.

The Organisation will take appropriate action to protect a whistle-blower who makes a serious allegation from any reprisals, harassment or victimisation.

Employees who wish to make a disclosure should do so, in the first instance, to their line manager, unless it is not appropriate to do so. If the disclosure cannot be made to their line manager, it should be made to a Church Warden.

Volunteers and contractors who wish to make a disclosure should do so to a Church Warden. If this is not appropriate, it can be done to a member of the PCC as Trustee or through the Charity Commission's whistle-blowing policy whistleblowing@charitycommission.gsi.gov.uk

Confidentiality

The Organisation 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.

Anonymous Allegations

This procedure encourages whistle-blowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful, but will be considered at the discretion of the PCC Chair or Church Warden, depending on the allegation.

In exercising discretion to accept an anonymous allegation the factors to be taken into account:

- The seriousness of the issue raised,
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant.

Untrue Allegations

No disciplinary or other action will be taken against a whistle-blower who makes an allegation in the reasonable belief that it is in the public interest to do so, even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistle-blower who makes an allegation frivolously, maliciously or for personal gain where there is no element of public interest.

Procedure for Making an Allegation

The whistle-blower should make their allegation as specified in the 'Reporting' section above.

Whether a written or oral report is made, it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation. Although someone making an allegation will not be expected to prove that it is true, they will need to provide information to the person they have reported it, to establish that there are reasonable grounds for the allegation.

The whistle-blower may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure, the right to be accompanied will at that stage be in accordance with the relevant procedure.

The person receiving an allegation will consider it and may discuss it with some or all of the Organisation's PCC, as appropriate. After consideration, they will then discuss with the whistle-blower if they wish to proceed with the allegation and if so, how it will be investigated.

Action on receipt of an Allegation

The investigator will record details of the allegation gathering as much information as possible, including:

- The record of the allegation,
- The acknowledgement of the allegation,
- Any documents supplied by the whistle-blower.

The investigator will ask the whistle-blower for his/her preferred means of communication and contact details and use these for all communications to preserve confidentiality.

If the allegation relates to fraud, potential fraud or other financial irregularity, and it is appropriate to do so, the PCC Treasurer will be informed within 5 working days of receipt of the allegation and he/she will advise on the investigation.

If the allegation discloses evidence of a criminal offence, it will immediately be reported to the Organisation's PCC and a decision will be made as to whether to inform the Police. If the allegation concerns suspected harm to a child or vulnerable adult, the Organisation's Safeguarding Policy will be followed.

Timetable

The allegation will be acknowledged in writing, usually within 5 working days, with:

- An indication of how the Organisation proposes to deal with the matter, whether further investigations will take place and if not, why not.
- An estimate of how long it will take to provide a final response.
- An indication of whether any initial enquiries have been made.
- Information on whistle-blower support mechanisms.

Where the allegation has been made internally and anonymously, obviously the Organisation will be unable to communicate what action has been taken.

Retraction of Allegation

Once an allegation has been made, it may be retracted at any time, but the Organisation reserves the right to proceed with the investigation, even if the individual does not wish to proceed further.

Outcome of investigation

The report of the investigation, inquiry or police action and any recommendations will be considered by the Organisation and a decision taken in consultation with any advisers deemed appropriate on what, if any, further action is required. Such action may include:

The whistle-blower will be advised of the outcome in writing and, if no action is to be taken, the reasons for it. If the whistle-blower is dissatisfied with the outcome, they may raise the matter with an appropriate external body, for example, to the Charity Commission or to the Health and Safety

Executive. Before taking this final course of action, the whistle-blower should consider discussing the matter with an independent third party, e.g. a legal advisor or the Citizens Advice Bureau. If they do take such action, the whistle-blower must notify the PCC that they have taken such action.

Support

The Organisation will take steps to minimise any difficulties which may be experienced because of making an allegation. For instance, if a whistle-blower is required to give evidence in criminal or disciplinary proceedings, the Organisation will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available.

Obviously, a whistle-blower needs to be assured that the matter has been properly addressed, so subject to legal constraints, the whistle-blower will be informed of the outcome of any investigation.

Any employee, volunteer or contractor under investigation will be advised as soon as is reasonably practicable and having regard to the nature of the disclosure. If they are to be questioned about the disclosure, they will be entitled to be accompanied by a trade union official, staff representative or colleague.

An employee under investigation may be suspended if it is not considered appropriate for them to remain at work whilst the investigation is carried out. Suspension does not imply that the employee has committed the offence and should be on full pay. If the investigation shows that the disclosure is without foundation, the employee should be allowed to return to work immediately. A decision to suspend must be taken by the Standing Committee of the PCC, if appropriate, or by the Church Wardens.

Responsibility for the Procedure

The PCC (as Trustees) have overall responsibility for the operation of this Procedure and for determining the administrative processes to be followed and the format of the records to be kept.

Monitoring

A Register will record the following details:

- The name and status (e.g., employee) of the whistle-blower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if so, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the PCC.

The PCC Chair will report periodically to the PCC on the operation of the Procedure and any whistleblowing allegations made during the period covered by the report. The report will be in a form that does not identify whistle-blowers.

Christ Church Purley April 2026

