Whistleblowing Policy and Procedure

1. Introduction

1.1 The Parochial Church Council ("PCC") of All Saints Parish Church High Wycombe (the "Church") is committed to the highest standards of openness, honesty and accountability.

1.2 The aims of this policy are:

(i) to encourage a culture of openness and accountability, promoted at all levels;

(ii) to encourage people to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated properly and promptly and, where possible, their confidentiality will be respected;

(iii) to provide office holders, employees, workers and volunteers in the Church with guidance as to how to raise those concerns, and

(iv) to reassure people that they should be able to raise genuine concerns without fear of reprisal.

2. Who does this policy apply to?

This policy applies to everyone who works for and in/or volunteers in the Church. This means employees, workers, office holders, volunteers and contractors.

3. What is Whistleblowing?

3.1 'Whistleblowing' refers to the internal or external disclosure of malpractice and serious suspected wrongdoing as well as illegal acts, or omissions, at work. It covers, for example, how we raise funds, how we commission work or make payments and where there has been a breach of a legal, statutory or regulatory requirement or unethical behaviour.

3.2 This policy is written in the context of the **Public Interest Disclosure Act 1998** (the "Act") and other legislation which protects employees and workers who 'blow the whistle' on malpractices within their organisation.

4. What types of concerns are covered by this Policy?

4.1 To use this whistleblowing policy and be legally protected under the Act, you must make a disclosure about a serious concern. This is known under the Act as a 'qualifying disclosure'. This means you have information and reasonably believe that one or more of the following matters is happening, has taken place, or is likely to happen in the future:

(i) a criminal offence (including fraudulent and corrupt behaviour, e.g. theft, fraud or financial malpractice)

(ii) a miscarriage of justice

(iii) failure to comply with any legal obligation

(iv) an act creating risk to health and safety

(v) an act causing damage to the environment

(vi) concealment of any of the above.

4.2 You do not need to have proof that such an act is being, has been, or is likely to be, committed. You do, however, need to hold a reasonable belief of such an action having been, being or likely to be carried out.

4.3 If you feel unable to whistle-blow internally, the matter may be reported directly to the relevant regulator, such as the Charity Commission or Church Commissioners.

5. What concerns cannot be raised as whistleblowing under this policy?

This whistleblowing policy does not apply to:

Complaints: A complaint that is an expression of your dissatisfaction which calls for a response. If you want to make a complaint about the Church you should contact the Rector on rector@allsaintshighwycombe.org.

Safeguarding concerns: For safeguarding concerns please contact the Police on 999 if there is a risk of immediate harm, otherwise please email the ASHW Safeguarding Officer, cfminister@allsaintshighwycombe.org.

Concerns about another organisation: If you have concerns about the behaviour of another Church of England organisation, you should raise them through that organisation, following any whistleblowing procedures it has.

Employment related concerns: This policy does not deal with any complaints employees may have about their own employment position, which should be addressed through ASHW's Grievance Procedure.

6. How to raise a concern

6.1 You should raise your whistleblowing concern as soon as possible. This will make it easier to act and to enable any problems to be resolved or reported quickly.

6.2 The Rector is designated to handle whistleblowing concerns in the Church and is the Church's Whistleblowing Officer.

6.3 You should report your concern in the first instance to your line manager/volunteer co-ordinator where appropriate, or to the Whistleblowing Officer. If the matter concerns the Whistleblowing Officer, it should be raised with the Churchwardens (wardens@allsaintshighwycombe.org).

6.4 You can make your disclosure orally but written disclosures are preferable as these will make the process more efficient and effective. In your disclosure, you should:

(a) provide any relevant context and background, including relevant dates, venues, names etc

(b) state clearly the reason why the situation causes for concern.

You must say that you are raising your concern using the Whistleblowing Policy and whether you wish your identity to be kept confidential. While we will make every effort to deal with your case confidentially, depending on the circumstances of the case this may not always be possible (e.g. if the police are involved). Where this is the case, you will be informed of this and the reasons why it was not possible. We prefer non-anonymous disclosures, as anonymity often makes it difficult to properly investigate concerns, protect employees or give feedback on outcomes.

6.5 If you are unsure whether to use this procedure, or you want independent advice at any stage, you should contact your trade union or an independent organisation such as Protect.

7. Protecting the individual raising the concern

7.1 If you raise a concern which you believe to be true, the PCC will take appropriate action to protect you from any harassment, victimisation or bullying. Employees and workers who raise a genuine concern under this policy will not be at risk of losing their job, nor will it influence any unrelated disciplinary action or redundancy procedures.

7.2 The matter will be treated confidentially but if the concern cannot be resolved without revealing your identity, the Whistleblowing Officer[1] will discuss with you whether and how to proceed.

7.3 You should note that they will not be protected from the consequences of making a disclosure if, by doing so, you commit a criminal offence.

8. How will the PCC deal with the concern?

8.1 How the concern will be dealt with will depend on what it involves. The Whistleblowing Officer will carry out a preliminary review as to whether the disclosure falls under the scope of this policy and whether there is prima facie evidence to suggest that it should be investigated and if so, appoint a person to investigate. The Whistleblower will be notified of the outcome.

8.2 If a formal investigation is deemed necessary, the concern will be investigated by the Whistleblowing Officer[2] or another member of the PCC deemed appropriate, through the disciplinary process or it may be referred to the police, Diocesan Safeguarding Adviser, a regulator, other agencies, an external auditor or an independent investigator.

8.3 The Whistleblower will be informed of progress and timescales of the investigation, although all information must be kept confidential.

8.4 Typically, the matters raised may result in one or more of the following:

(a) no action required

(b) action being taken under another policy or procedure

[1] Or other person managing the process, where the complaint involves the Whistleblowing Officer.
[2] Or other person managing the process, where the complaint involves the Whistleblowing Officer.

(c) an internal investigation under this policy

(d) a referral to the police or other relevant statutory body

(e) referral to the Church Commissioners

(f) a referral to ASHW's external auditors

(g) a Serious Incident Report being made to the Charity Commission

(h) an independent enquiry.

8.5 It may be necessary for you to give evidence in criminal or disciplinary proceedings.

9. Allegations that are malicious or known to the individual making them to be false

9.1 If it is found that you have knowingly or maliciously made an untrue allegation or you are involved in any way in the malpractice, wrongdoing or illegal acts or omissions, the PCC will take appropriate action in accordance with the appropriate policy.

9.2 If the suspicions are not confirmed by an investigation, the matter will be closed and a record retained. Any person raising a concern under this policy will not suffer any detriment for raising the concern unless they are found to have made a malicious allegation.

10. **Policy Review**

This policy will be reviewed every three years.

		Date
Approved by:	PCC	22 July 2026