



## Diocese of Peterborough Whistleblowing Policy

### Policy summary

The Diocesan Board of Finance (DBF) believes in creating an environment of transparency, integrity and accountability. This policy serves as a cornerstone of our commitment to upholding these values. It provides a mechanism through which our staff can raise concerns about potential wrongdoing, unethical behaviour, or abuses of DBF policies or standards of behaviours without fear of reprisals. This policy should be read in conjunction with the Staff Handbook.

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**Approval and review**

Approved by	
Policy owner	Diocesan Secretary
Policy author	Assistant Diocesan Secretary
Date	09/01/2025
Review date	08/01/2026

**Revision History**

Version No	Revision Date	Previous revision date	Summary of Changes
1.0	13/03/2024	N/A	New Policy
1.1	04/12/2024	N/A	Amendment to provide clarity on where to report to in the event the whistleblowing relates to the Diocesan Secretary.

## 1. Introduction

1.1. The Diocesan Board of Finance (DBF) believes in creating an environment of transparency, integrity, and accountability. This policy serves as a cornerstone of our commitment to upholding these values. It provides a mechanism through which our staff can raise concerns about potential wrongdoing, unethical behaviour, or abuses of DBF policies or standards of behaviours without fear of reprisals. By encouraging open communication and providing clear procedures for reporting concerns we aim to ensure that any issues are promptly addressed and resolved in a fair and impartial manner. This policy is designed to protect both the interests of the DBF and the well being of our employees ultimately contributing to a culture of trust and responsibility.

## 2. What is Whistleblowing?

2.1. Whistleblowing is the reporting of misconduct, illegal activities or unethical behaviour occurring within the workplace. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of our legal and professional obligations. Workers who make such a disclosure are protected by law, under the Public Interest Disclosure Act 1998, from detrimental treatment or victimisation by their employer if, in the public interest, they blow the whistle on wrongdoing.

## 3. How to raise a concern

3.1. In the first instance, any concerns should be raised with your line manager. In the case of Safeguarding issues, any concerns should be raised with the Diocesan Safeguarding Officer [Victoria.kellett@peterborough-diocese.org.uk](mailto:Victoria.kellett@peterborough-diocese.org.uk) .

3.2. If you believe your line manager to be involved, or for any reason do not wish to approach your line manager, then you should inform the Diocesan Secretary [andrew.roberts@peterborough-diocese.org.uk](mailto:andrew.roberts@peterborough-diocese.org.uk), who will arrange for another officer to make any necessary enquiries and make his/her own report to the Board. Any approach to the Diocesan Secretary will be treated with the strictest confidence. Your identity will be kept confidential as far as possible although if there is a criminal investigation you may be needed as a witness.

3.3. If your concern relates to the Diocesan Secretary, then you should raise

your concerns directly with the Chair of the Diocesan Board of Finance Dr Paul Buckingham c/o The Assistant Diocesan Secretary [sue.ratcliffe@peterborough-diocese.org.uk](mailto:sue.ratcliffe@peterborough-diocese.org.uk)

- 3.4. We will arrange a meeting with you as soon as possible to discuss your concern(s). You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 3.5. The line manager will arrange an investigation of the matter (either by investigating the matter him/herself or immediately passing the issue to someone in a more senior position). The investigation may involve you and other individuals involved giving a written statement. Your statement will be taken into account, and you will be asked to comment on any additional evidence obtained.
- 3.6. The line manager (or the person who carried out the investigation) will then report to the Chairman of the Board of Finance, who will take any necessary action, including reporting the matter to the Board or any appropriate government department or regulatory agency. If disciplinary action is required, the line manager (or the person who carried out the investigation) will report the matter to the Diocesan Secretary and start the disciplinary procedure. On conclusion of any investigation, you will be told the outcome of the investigation and what the Board has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained. If on conclusion of the process you reasonably believe that the appropriate action has not been taken, you should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made.

These include: • HM Revenue and Customs • the Financial Conduct Authority; • the Office of Fair Trading; • the Health and Safety Executive; and • the Environment Agency.

- 3.6. Disclosures relating to charities can be made to the Charity Commission and a qualified disclosure to the Commission will be a 'protected' disclosure provided the employee makes the disclosure in good faith and has a reasonable belief that: • The relevant failure relates to the proper administration of charities and funds given or held for charitable purposes; and • Reasonably believes that the information disclosed and any allegation contained in it are substantially true.

#### 4. Confidentiality

4.1. We hope that you will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

#### 5. Protection and Support for Whistleblowers

5.1. We aim to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

5.2. The following people, or 'workers', are protected: • employees • agency workers • people that are training with the Board, but not employed • self-employed workers, if supervised or working off-site. Whilst the Act does not provide the same protection for volunteers, the Diocese of Peterborough adopts the same approach in their protection.

5.3. The Public Interest Disclosure Act 1998 provides protection for workers who raise legitimate concerns about specified matters, called "qualifying disclosures". A qualifying disclosure is one made in good faith by an employee who has a reasonable belief that: • a criminal offence; • 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 worker to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. The worker has no responsibility for investigating the matter - it is the Board's responsibility to ensure that an investigation takes place.

5.4. Whistle-blowers must not suffer any detrimental treatment because of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Diocesan Secretary or your line manager immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

5.5. We do not condone threats or retaliation against whistle-blowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

5.6. However, if we conclude that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower may be subject to disciplinary action.

- 5.7. Protect (formerly Public Concern at Work) operates a confidential helpline. Their contact details are Helpline: (020) 3117 2520; Website: <https://protect-advice.org.uk/contact-protect-advice-line>