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WESTBURY ON TRYM - BRISTOL

9.6 Speaking Out (Whistleblowing) Policy and Procedure

Status of Policy: Non-Contractual

Policy applies to: Employees and Volunteers of Westbury-on-Trym Parochial Church Council (the PCC)

Review Date: 08.11.2021

This policy replaces section 9.6 of the Employment Handbook and the appendix is included at section 17.5A (between 17.5 and 17.6)

9.6.1 Introduction

The PCC recognises that there may be times where the member of staff or volunteer personally feels that there is something seriously wrong within the organisation. It is important that they feel empowered to come forward and raise concerns without fear of intimidation and that a culture of openness is fostered.

The PCC is committed to developing a culture of openness and accountability and takes all forms of alleged malpractice, fraud, corruption or abuse very seriously. It is very concerned about the potential effect of these matters on the services it provides.

It is important, therefore, that the member of staff or volunteer feels comfortable raising issues which concerns them either about something that has already happened or which they think is at risk of happening – for example, concerns about possible criminal offences being committed; the health and safety of any individual; failures to comply with legal obligations; harm to the environment; or the concealment of information about any of these. They may be worried that by reporting issues of concern, they are exposing themselves to possible victimisation, disciplinary action or putting their role with the Parish at risk. The PCC understands these concerns, and this policy has been implemented to reassure the member of staff or volunteer that this is not the case.

Please note that making a safeguarding disclosure is different to Speaking Out. Safeguarding concerns relate to the possibility of abuse, harm or neglect of a child or of an adult at risk. If a member of staff or volunteer has such a concern, then they should raise their suspicion/allegation to **the Parish Safeguarding Officer, or the** Diocesan Safeguarding Adviser (0117 9060100) or, out of hours to the Churches' Child Protection Advisory Services (0845 1204550) or to the Police or Local Authority.

9.6.2 Purpose and Scope

Purpose of the policy

The purpose of this policy is to provide a safe mechanism for anyone who works for the PCC whether paid or unpaid, to come forward and raise any concerns they have without fear of detriment or reprisal. The policy aims to:



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL

- Encourage them to feel confident in raising concerns and questioning and acting upon concerns about practice
- Provide avenues for them to raise concerns and receive timely feedback on any actions taken
- Ensure they receive a response to their concerns and that they are aware how to pursue their concerns if they are not satisfied
- Provide reassurance that they will be protected from possible reprisals or victimisation

Scope of the policy

This policy applies to all employees and volunteers of the PCC. This policy also applies to staff who have left the PCC within a three month period i.e. three months from the last working day at the PCC; to agency staff; staff seconded to work in the PCC; students on placement; other learners; volunteers and sub-contracted staff.

9.6.3 Key principles

The PCC positively encourages anybody who has a concern to speak out. If a member of staff or a volunteer has serious concerns they are entitled to - and should - raise them. The member of staff or volunteer needs to reasonably believe that such a disclosure is **true**, and is made **in the public interest** (“in the public interest” has a number of definitions but broadly means anything affecting the health, the rights or the finances of the public at large - for example public safety or suspected fraud).

Disclosures “in the public interest”

Examples of concerns “in the public interest” which might be spoken out about include:

- **Public/staff safety** – for example, malpractice, or ill treatment of a parishioner/member of the public/staff member by any member of staff, or repeated ill treatment despite a complaint having been made. NB if there are any concerns about **abuse, harm or neglect** of a **child** or of an **adult at risk** then these concern/suspicion/allegations should immediately be raised with the Diocesan Safeguarding Adviser (0117 906100) or, out of hours to the Churches’ Child Protection Advisory Services (0845 1204550) or to the Police or Local Authority.
- **Health and safety issues** e.g. that the health or safety of any person (member of the public or member of staff) has been, is being or is likely to be endangered or disregarded for legislation – particularly in respect of health and safety at work.
- **Financial matters** including fraud, corruption or abuse of position or a breach of standing financial instructions or standing orders.
- **Unlawful conduct** – e.g. that a criminal offence has been committed, is being committed or is likely to be committed.
- **Breaches of legal obligations** e.g. that a person has failed, is failing or is likely to fail to comply with a legal obligation which they are subject to.
- **Damage to the environment** - e.g. that the environment has been, is being or is likely to be damaged.
- That information relating to any of the above has been, is being or is likely to be **deliberately concealed**.



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL

The member of staff or volunteer does not need to have firm evidence before raising a concern, but should explain, as fully as they can, the information or circumstances which have given rise to their concern.

Should the concern relate to another organisation, the Line Manager or other responsible person hearing the concern will raise this with the Vicar or the Church Wardens as appropriate who will contact an appropriate senior manager at the other organisation to request that the matter is investigated, where this is necessary and appropriate. The member of staff or volunteer will not be discriminated against or victimised for raising concerns which they reasonably believe to be in the public interest under this policy.

Both the person raising concerns and those who are potentially the focus of a concern will be treated with fairness and openness.

They have the right to be accompanied by a colleague at any time during the process. Consideration will also be given to allowing them to be accompanied by a friend, not acting in a legal capacity. This consideration will be subject to the nature and sensitivities of the case.

Concerns which are not disclosures “in the public interest”

As explained above, when someone speaks out “in the public interest” they are raising a concern about a risk, wrongdoing or malpractice or an illegal act that affects others (e.g. members of the public, other staff or the PCC). The person speaking out is usually not directly, personally affected - they are simply trying to alert others.

This is very different from a complaint or a grievance. When someone complains, or raises a grievance, they are saying that they have personally been poorly treated. This poor treatment could involve a breach of their individual employment rights or bullying and the complainant is seeking redress or justice for themselves (or sometimes for a colleague when, for example, they have seen someone else being bullied). The person making the complaint therefore, has a vested interest in the outcome of the complaint.

For these reasons, it is not in anyone's interests if the Speaking Out policy is used to pursue a personal grievance. Instead, people should seek advice from their Line Manager or Church Warden about using a Grievance Policy, or Dignity at Work Policy to address their concerns.

9.6.4 Duties, roles and responsibilities

Line Managers

All Line Managers are responsible for ensuring that staff are aware of the policy and its application, and for creating an environment in which staff are able to express concerns freely and without fear of reprisal.

Staff

Every member of the staff of the PCC has a responsibility to raise concerns providing they have a reasonable belief that malpractice and/or wrongdoing has occurred.

The PCC



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL

The PCC has the responsibility to:

- Ensure confidentiality clauses in employment contracts do not restrict, forbid or penalise speaking out.
- Ensure that a person who speaks out receives support and that all reasonable steps are being taken to ensure that the individual raising the concerns is not subject to victimisation.
- Treat victimisation of whistleblowers as a serious matter by fully investigating and taking appropriate disciplinary action, against any members of staff who it is found have victimised or tried to victimise a person raising a legitimate concern.
- Not attempt to conceal evidence of poor or unacceptable practice.
- Take disciplinary action if an employee destroys or conceals evidence of poor or unacceptable practice or misconduct.

Leads for the Speaking Out Policy

The PCC leads for the Speaking Out Policy are the Secretary to the PCC, the Vicar and the Church Wardens who will ensure that concerns are investigated effectively and are in line with the formal procedure described within this Policy. They will have the responsibility to ensure that there is adequate communication and support for those individuals against whom allegations have been made.

On behalf of the Parish Council, the Standing Committee will receive an annual report of all Speaking Out cases raised, via the Secretary to the PCC, in order to monitor progress of investigations and summary outcomes of individual cases on a regular basis.

9.6.5 Confidentiality

If the person raising the concern wishes to keep their identity confidential then, as far as is possible, it will not be disclosed without their consent.

If the situation arises where the concern cannot be resolved without revealing their identity, then whether and how to proceed will be discussed with them. Confidentiality cannot be maintained if the manager or person to whom the concerns are expressed considers that there is an immediate risk to safety and that, therefore, the matter must be addressed immediately or if the PCC is required by law to break that confidentiality. In such circumstances the person raising the concern would be informed of this course of action and a support plan would be mutually agreed.

9.6.6 Other relevant policies and procedures

The Speaking Out Policy should be read in conjunction with other relevant policies and procedures, which in certain circumstances may be more appropriate. These include:

- Safeguarding Policy and Procedure
- Dignity at Work Policy and Procedure
- Disciplinary Policy and Procedure
- Grievance Policy and Procedure
- Performance Improvement Policy and Procedure.
- Appeals Policy and Procedure.



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL

It should also be considered alongside the Public Interest Disclosure Act and any relevant professional or ethical guidelines and codes of conduct.

9.6.7 Speaking Out (Whistleblowing) Procedure

To support the Speaking Out Policy, this Procedure sets out both informal and formal processes and supporting information.

Procedure – how to raise concerns

The member of staff or volunteer can raise concerns under the Speaking Out policy either informally or formally (see below).

So that the concerns can be assessed and investigated at any informal or formal stage, it would be helpful if the person raising the concern is as clear as possible with the details. The person they are meeting with will need to understand the following:

- what happened – the nature of the incident(s)
- who was involved
- when it happened – dates and times
- where it happened – locations
- who was present/involved when the incident(s) took place
- why the person raising the concern thinks it occurred (if possible)
- any effects on them (including those which may have been experienced outside of work)
- the frequency of any incidents
- any steps they have already taken (e.g. whether they have already raised the matter informally or at an earlier formal stage and with whom).
- any other issues relating to the concern.

If the person raising the concern feels comfortable sharing their identity then they should provide the person they are approaching, with their name, their work location (or if not an employee, their home address) and contact details.

If possible, they should explain how they think the matter may be best resolved.

In both informal and formal stages of the procedure, the person (e.g. Line Manager, Vicar or Church Warden) to whom the concerns are raised will discuss with the person raising the concerns how feedback can be given (unless they have chosen to raise their concerns anonymously). Some investigations take longer than others, but the person dealing with the concerns will give feedback (wherever possible, within the time frames indicated in the procedure), and will advise, if the investigation is not yet complete, when more feedback can be expected.



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL

NB If the person raising the concern believes there are strong reasons why they should not approach their Line Manager, the Vicar or a Church Warden at the informal stage or at stage one – formal process, then they can approach any other Officer of the PCC at stage 2 – formal process without following the earlier stages of the procedure.

Raising a concern informally

Informal Process

The member of staff or volunteer can raise their concerns by speaking with/writing to:

- The Line Manager, the Vicar or a Church Warden who is responsible for the area of work which they are concerned about.
- Their own Line Manager (if this is somebody different) or to the Secretary of the PCC.

They will need to make it clear that they are raising a concern under the Speaking Out policy.

If the person who is raising a concern does not want anybody other than the person they are telling to know about this yet, it isn't recommended that the concern is raised via email because in some cases staff other than the named recipient have permission to view emails

They should also make sure that they say if it is important for them to remain anonymous.

If they do not feel strongly that their concern must be raised anonymously but they would like their identity to be kept confidential (not disclosed without discussing it with them first) then this should be explained when the concern is raised.

The member of staff or volunteer can involve their trade union representative, if they have one, in helping them raise the matter. If they do not have a trade union representative then they may want to be accompanied at a meeting by a colleague or (with the permission of the person they are meeting with) a friend not acting in a legal capacity.

If the member of staff or volunteer speaks with a Line Manager, the Vicar or a Church Warden, then that person will either:

- arrange for the concerns to be looked into/investigated *or*
- direct the member of staff or volunteer to the Grievance or Dignity at Work Policies (if this is more appropriate).

The meeting will be recorded in writing and a copy of the notes will be given to the person raising the concern - within 5 working days where possible. The person dealing with the concern will also discuss with them how feedback will be given..

The identity of the person raising the concern will not be disclosed without their permission unless there is a requirement to do so (for example for safety or legal reasons). In such circumstances they will be informed of this course of action and a support plan will be mutually agreed.

The PCC hopes that this will resolve the member of staff or volunteer's concerns. If it does not then they should move to **the formal process** – set out below.



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL

Raising a concern formally

The PCC would like to encourage members of staff and volunteers to raise their concerns informally, in the first instance. However, if the informal action (however they choose to raise it) does not address their concerns or if they feel strongly that the matter is too serious to be dealt with through an informal process, then they should use the formal steps of the Speaking Out Policy outlined below.

Stage 1 – formal process

The member of staff or volunteer can raise their concerns formally at stage 1 by writing to their Line Manager, a Church Warden or the Vicar or, if they think it is inappropriate to approach these people, to the Vice Chair of the PCC or any other officer of the PCC, explaining their concerns. When writing to raise a concern the envelope should be marked “strictly confidential – for the attention of addressee only”.

If the member of staff or volunteer is raising a concern formally, and they don't want anybody other than the person they are telling to know about this yet, it isn't recommended that the concern is raised via email because in some cases staff other than the named recipient have permission to view emails

The member of staff or volunteer will need to make it clear that they are formally raising a matter of serious concern in the public interest under the Speaking Out Policy and advise of any process they have followed so far (e.g. the informal process stage).

They should make sure that they say if it is important for them to remain anonymous.

If the member of staff or volunteer does not feel strongly that their concern must be raised anonymously but they would like their identity to be kept confidential (not disclosed without discussing it with them first) then this should be explained when the concern is raised.

As with the informal process, the member of staff or volunteer can involve their trade union representative in helping them raise the matter. If they do not have a trade union representative then they may want to be accompanied at a meeting by a colleague or (with the permission of the person they are meeting with) a friend not acting in a legal capacity.

The person who has been written to will meet with the person raising the concern within five working days of receipt of the communication. They may request that an independent witness is also present – the person raising the concern can choose whether to agree to this. The matters that are raised will be reviewed, fully considered and may be formally investigated.

The contents of the meeting will be recorded in writing and a copy given to the person raising the concern – wherever possible, within five working days of the meeting. The manager will also discuss with them how they will receive feedback.

The identity of the person raising the concern will not be disclosed without their permission unless there is a requirement to do so (for example for safety or legal reasons) In such circumstances they will be informed of this course of action and a support plan will be mutually agreed.



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL

The PCC hopes that this will resolve the member of staff or volunteer's concerns. If it does not then they should move to **the formal process stage 2** – set out below.

Stage 2 – Formal Process

If the member of staff or volunteer is dissatisfied with the response they have received at formal stage 1 they can move on to stage 2 of the formal process. They may also move directly to stage 2 without following the earlier stages of the procedure if they believe that there are strong reasons why they should not approach their Line Manager, a Church Warden or the Vicar.

The member of staff or volunteer can raise their concerns formally at stage 2 by writing to the Vice Chair of the PCC, **or** if this is inappropriate, **or** they have already approached this person, to any other officer of the PCC, explaining their concerns. When writing to raise a concern the envelope should be marked “strictly confidential – for the attention of addressee only”.

If the member of staff or volunteer is raising a concern formally, and they don't want anybody other than the person they are telling to know about this yet, is isn't recommended that the concern is raised via email because in some cases staff other than the named recipient have permission to view emails

The member of staff or volunteer needs to make it clear that they are formally raising a matter of serious concern in the public interest under the Speaking Out Policy and advise of any process they have followed so far (e.g. the informal process stage and/or stage 1 of the formal process).

They should make sure that they say if it is important for them to remain anonymous.

If the member of staff or volunteer does not feel strongly that their concern must be raised anonymously but they would like Their identity to be kept confidential (not disclosed without discussing it with them first) then this should be explained when the concern is raised.

As with the informal and stage 1 processes, the member of staff or volunteer can involve their trade union representative in helping them raise the matter. If they do not have a trade union representative then they may want to be accompanied at a meeting by a colleague or (with the permission of the person they are meeting with) a friend not acting in a legal capacity.

The person who has been written to will arrange to meet with the person raising the concern within ten working days of receipt of the communication. They may request that an independent witness is also present – the person raising the concern can choose whether to agree to this. The concerns that are raised will be fully reviewed, and an investigation may be arranged.

The contents of the meeting will be recorded in writing and a copy given to the person raising the concern within five working days of the meeting, wherever possible. There will be a discussion about how they will receive feedback.

The identity of the person raising the concern will not be disclosed without their permission unless there is a requirement to do so (for example for safety or legal reasons) In such circumstances they will be informed of this course of action and a support plan will be mutually agreed.



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL

17.5A Speaking Out (Whistleblowing) Policy and Procedure

17.5A.1 Frequently Asked Questions

What is Speaking Out (Whistleblowing)?

Speaking Out (Whistleblowing) means that a member of staff or volunteer raises a concern about a possible risk, wrong-doing or malpractice that has a public interest aspect to it - usually because it threatens or poses a risk to others (e.g. parishioners, colleagues or the wider public).

Whistleblowing concerns are different from grievances, which by contrast are about the staff member's own employment position and have no **additional** public interest.

Is Speaking Out the same as making a Safeguarding Disclosure?

No. A safeguarding concern is more specific – it is a concern which relates to the possibility of **abuse, harm or neglect** of a **child** or of an **adult at risk**.

If you have such a concern, then you should raise your concern/suspicion/allegation to the Diocesan Safeguarding Adviser (0117 906100) or, out of hours to the Churches' Child Protection Advisory Services (0845 1204550) or to the Police or Local Authority.

What, exactly, is the difference between raising a grievance/complaint and Speaking Out (Whistleblowing)?

When someone "speaks out" they are raising a concern about a risk, wrongdoing or malpractice or an illegal act that affects others (e.g. parishioners, clergy, staff or public). The person speaking out is usually not directly, personally affected - they are trying to alert the right people so that the issue can be addressed.

This is very different from a complaint. When someone complains, they are saying that they have personally been poorly treated. This poor treatment might, for example, involve a breach of their individual employment rights, a breach of their own contract, or them having experienced bullying behaviour, and the complainant is seeking redress or justice for themselves. The person making the complaint therefore, has a vested interest in the outcome of the complaint.

For these reasons, it is not in anyone's interests if the Speaking Out policy is used to pursue a personal grievance. Instead, people should seek advice from their manager or the Human Resources team about using a Grievance Policy, or Tackling Harassment and Bullying policy to address their concerns.

However, if you have a concern that there is a culture of bullying in a part of the organisation and that this poses a risk to others, then then you may want to use the Speaking Out procedure – or the Safeguarding procedure if they think that children or adults at risk may be affected.



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL

What does “in the public interest” mean?

In the public interest” broadly means anything affecting the health, the rights or the finances of others e.g. the general public.

Why should I speak out?

All staff have a right and a duty to raise genuine concerns, which they consider to be in the public interest, with their employer.

Speaking Out (Whistleblowing) can inform the people who need to know about health and safety risks, potential environmental risks, fraud, corruption and many other problems. Often it is only through speaking out that this information comes to light and can be addressed before real damage is done.

Speaking Out is a valuable activity which can positively influence our working lives and the lives of our parishioners, colleagues and the wider public.

Will I risk being disciplined or dismissed for speaking out?

The Speaking Out policy is in place to reassure you that it is safe and acceptable to speak up and to enable you to raise any concern you may have at an early stage and in the right way. Rather than wait for proof, we would prefer you to raise the matter when it is still a concern.

If you raise a genuine concern, in the public interest, under this policy you will not be at risk of losing your job or suffering any form of retribution as a result. The PCC will not tolerate anyone attempting to stop you, harass, bully or victimise you or otherwise take action against you in any way.

Provided you are acting in good faith (honestly), it does not matter if you are mistaken or if there is an innocent explanation for your concerns. What we ask us to do is to tell us about your concerns, and explain what has happened and why you are worried.

The Public Interest Disclosure Act (PIDA) also protects staff who raise a genuine concern (a “qualifying disclosure”) in the public interest.

Of course this assurance is not extended to someone who **maliciously** raises a matter they know is **untrue**. This would be regarded as a serious disciplinary offence and would be investigated in accordance with the Disciplinary procedure.

What is the Public Interest Disclosure Act?

The Public Interest Disclosure Act (PIDA) came into force in 1998 - it is often referred to as the “whistleblowing law”. This Act gives employees protection under the law and means that employers must not victimise any employee who raises a genuine concern in the public interest either internally or to a prescribed regulator. The Act covers all workers including temporary agency staff, people on training courses and self-employed staff who are working for and are supervised by an organisation. It does not cover volunteers – although the policy does apply to volunteers.

Where a person is subject to a detriment by their employer for raising a concern or is dismissed in breach of PIDA, they can bring a claim for compensation.



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL

What is a “Qualifying Disclosure”? What kind of things should I speak out about?

The Public Interest Disclosure Act (PIDA) 1998 says that, to be covered (and therefore protected) by the act, information disclosed by a concerned person needs to be a “qualifying disclosure”.

A “qualifying disclosure” means any disclosure of information which, in reasonable belief of the person making the disclosure, shows concerns about one or more of the following things (therefore, these are the kind of things which you might speak out about):

- **Public/staff safety** – for example, malpractice, or ill treatment of a parishioner/member of the public/staff member by any member of staff, or repeated ill treatment despite a complaint having been made. NB if you are concerned about **abuse, harm or neglect** of a **child** or of an **adult at risk** then you should contact the Safeguarding adviser.
- **Health and safety issues** e.g. that the health or safety of any person (member of the public or member of staff) has been, is being or is likely to be endangered or disregard for legislation – particularly in respect of health and safety at work.
- **Financial matters** including fraud, corruption or abuse of position or a breach of standing financial instructions or standing orders
- **Unlawful conduct** – e.g. that a criminal offence has been committed, is being committed or is likely to be committed
- **Breaches of legal obligations** e.g. that a person has failed, is failing or is likely to fail to comply with a legal obligation which s/he is subject to.
- **Damage to the environment** - e.g. that the environment has been, is being or is likely to be damaged
- That information relating to any of the above has been, is being or is likely to be **deliberately concealed**

It can also include:

- Other financial irregularity
- Unethical practice
- Negligence
- Maladministration (lack of care, judgment, or honesty in the management of something)
- Showing undue favour over contractual matters or to job applicants.
- A breach of a professional code of conduct
- Failure to comply with a statutory obligation

Can I speak out anonymously?

With the assurances detailed here and in the policy, we hope you will raise your concern openly. However, we recognise that there may be circumstances when you would prefer to speak to someone in confidence first. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law.

You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL

If you feel strongly that you want to remain anonymous you can do so by writing to the appropriate person (see below) making it clear that you are raising a concern but that you wish to remain anonymous.

Please remember that if you do not tell us who you are it will be much more difficult for us to properly investigate and look into the matter. If you remain anonymous you will not be able to receive any feedback on the outcome of the investigation into the concern and it is more difficult for us to protect your position – since we will not know who you are.

If you raise a concern under either the informal or the formal stages of the Speaking Out (Whistleblowing) Policy and Procedure then, you can make it clear to the person you speak out to that you want to keep your identity confidential.

What is the difference between anonymity and confidentiality?

A person raises a concern confidentially if he or she gives his or her name only on condition that it is not revealed without their consent. A person raises a concern anonymously if he or she does not give his or her name. Usually, the best way to raise a concern is to do so openly.

If you wish to keep your identity confidential it will not be disclosed without your consent, other than in the circumstances below:

If, exceptionally, the situation arises where the concern cannot be resolved without revealing your identity then whether and how to proceed will be discussed with you. Confidentiality cannot always be maintained if the manager or person to whom the concerns are expressed considers that there is an immediate risk to public/staff safety and that, therefore, the matter must be addressed immediately. In such circumstances you would be informed of this course of action and a support plan will be mutually agreed.

If I want to speak out, what information will I need to provide?

So that your concerns can be assessed and investigated at any informal or formal stage, it would be helpful if you could be as clear as possible with the details. The person you are meeting with will need to understand the following:

- what happened – the nature of the incident(s)
- who was involved
- when it happened – dates and times
- where it happened – locations
- who was present/involved when incident(s) took place
- why you think it occurred (if possible)
- any effects on you (including those which may have been experienced outside of work)
- the frequency of any incidents
- If possible, explain how you think the matter might be best resolved or start thinking about it in preparation for any meetings you may be required to attend (if you have shared your identity)
- Any steps you have already taken (e.g. whether you have already raised the matter informally or at an earlier formal stage and with whom).
- any other issues relating to the concern.
- If you feel comfortable sharing your identity then please provide us with your name, your work location and contact details



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL

What happens after I have spoken out?

Your concerns will be looked into. In some cases, an investigation will be arranged. You may be contacted for a further interview to discuss your concerns. There will be no pressure on you to **prove** that the concern you have raised is true – what is needed is for you to tell us what you have seen/heard and what your concerns are.

What if I have completed the formal process and I am still dissatisfied with the response I have received?

If you are not satisfied with the response to your concerns and are worried that your concern has not been taken seriously or has not been dealt with appropriately, you may wish to seek further advice from your trade union, if you have one.

If you reasonably believe, once you have exhausted the formal process, that appropriate action has not been taken, then you can report a qualifying disclosure to the appropriate authority/regulatory body. These include:

- HM Revenue & Customs
- Financial Services Authority
- Office of Fair Trading
- Health & Safety Executive
- Environment Agency
- Director of Public Prosecution
- Serious Fraud Office.

For these disclosures to be protected the following requirements must be met:

- (i) the concern falls within the ambit of that regulatory body; and
- (ii) you must reasonably believe that the information is substantially true; and
- (iii) the disclosure is being made in good faith and in the public interest.

It is strongly recommended that you seek further advice before escalating concerns externally. You may want to contact Public Concern at work (an independent charity) – see below.

Can I get independent advice from outside the parish about raising a concern?

Yes. You can contact the independent charity Public Concern at Work, which runs a free help line for people who are worried about wrong doing in the workplace but who are unsure whether or how to raise the concern. Contact 020 7404 6609, or www.pcaaw.co.uk for free confidential advice at any stage about how to raise a concern about serious malpractice at work.

Can I disclose my concerns to the Media?

It is not encouraged that any of us make a disclosure to the media as the first response to a concern. The reason for this is that it can adversely affect any investigations and evidence related to the concern. If you feel strongly that your concern in the public interest has not been addressed adequately, despite following the full Speaking Out procedure, and you are considering making an



HOLY TRINITY

WESTBURY ON TRYM - BRISTOL

approach to the media then it is recommended that you first speak with the Diocesan Communications Officer (on 0117 9060100).

Concerns raised in the public interest should not be posted to social media platforms such as Twitter and Facebook. This approach is not appropriate for the raising and resolution of concerns in the public interest, and there may be additional legal considerations in posting concerns to these forums.

What if my concerns are not about this parish, but about another related organisation?

If you have a concern about another organisation, then please contact your Line Manager or another appropriate person such as the Vicar or a Church Warden to explain the concerns you have. This person will then contact the appropriate person in the other parish /organisation to advise them of your concerns.