



Whistleblowing Policy and Procedure

Approved: February 2025

Next Review Date: February 2028

Loving. Living. Learning.

Introduction

1. The Leeds Diocesan Board of Finance (The Board) is committed to dealing with any fraud, misconduct or wrongdoing by employees of, or volunteers acting on behalf of, our organisation that is reported to us. It is important to us that any fraud, misconduct or wrongdoing by staff or volunteers of our organisation is reported and properly dealt with. We therefore encourage all individuals to raise any concerns that they may have about conduct of others in our organisation or the way in which the organisation is run. This policy and procedure sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

Scope

2. This policy and procedure applies to all employees and volunteers of The Board. Any complaint about the behaviour of Clergy are dealt with under a separate process. If the complaint relates to clergy misconduct the individual may make a complaint to the Diocesan Bishop.

Our Values

3. The Diocesan values, Loving, Living, Learning, are vital in how we expect people to behave. We aim to:
 - **Love** God, the world and one another.
 - **Live** in the world as it is, but, drawn by a vision of something better, we want to help individuals and communities flourish,
 - **Learn** when we get things wrong, by listening and growing together.

Principles

4. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees/volunteers should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
5. Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the employee/volunteer that raised the issue.
6. No employee/volunteer will be victimised for raising a matter under this procedure. This means that the continued employment/volunteering and opportunities for future promotion or training of the employee/volunteer will not be prejudiced because they have raised a legitimate concern.
7. Victimisation, bullying, or harassment of an employee/volunteer for raising a qualified disclosure will be a disciplinary offence.
8. If misconduct is discovered as a result of any investigation under this procedure the organisation's disciplinary procedure will be used, in addition to any appropriate external measures.
9. Maliciously making a false allegation is a disciplinary offence.

10. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees/volunteers should not agree to remain silent. They should report the matter to the CEO/Diocesan Secretary or the Chair of the House of Laity.
11. This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that their own contract has been, or is likely to be, broken, they should use the organisation's grievance procedure.

Background

12. The law provides protection for employees/volunteers who raise legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by an employee/volunteer 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.
13. It is not necessary for the employee/volunteer to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The employee/volunteer has no responsibility for investigating the matter - it is the organisation's responsibility to ensure that an appropriate investigation takes place.
14. An employee/volunteer who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.
15. The organisation encourages employees/volunteers to raise their concerns under this procedure in the first instance. If the individual is not sure whether or not to raise a concern, they should discuss the issue with their line manager or the People team.
16. Personal grievances (for example bullying, harassment, discrimination) are not covered by this policy and procedure, unless the particular case is in the public interest (affects others), and should instead be dealt with using the diocesan grievance procedure.

Procedure

17. In the first instance, and unless the employee/volunteer reasonably believes their line manager to be involved in the wrongdoing, or if for any other reason the employee/volunteer does not wish to approach their line manager, any concerns should be raised with the individual's line manager. If they believe the line manager to be involved, or for any reason does not wish to approach the line manager, then they should proceed straight to stage 3.

- a. *How to raise a concern* – The individual should raise their whistleblowing concern as soon as possible. Early reporting can make it easier to act and resolve any problems. The concern can be made in writing or verbally. A written account is preferable because it can make managing the process more efficient and effective. The account of concerns should include:
 - i. any relevant background and context;
 - ii. dates, times, names and venues; and
 - iii. a description of the concern and why the situation caused concern.

18. The line manager will arrange an investigation into the matter (either by investigating the matter personally or immediately passing the issue to an SLT lead). The investigation may involve the employee/volunteer and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. The statement of the employee/volunteer will be taken into account, and they will be asked to comment on any additional evidence obtained. The line manager (or the person who carried out the investigation) will then report to the CEO/The Board, who will take any necessary action, including reporting the matter to 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 People team and commence the disciplinary procedure. On conclusion of any investigation, the employee/volunteer will be told the outcome of the investigation and what the CEO/The Board has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

a. *How will this be investigated* –

- i. An acknowledgement by letter or email will be sent to confirm receipt of the complaint within five working days of it being received.
- ii. If the complaint falls within the procedure, it will be considered thoroughly and objectively by a person who will have no previous involvement with the matter. Exceptionally, a second person may be appointed to assist.
- iii. The appointed person(s) will read any files and may meet with the whistleblower if required to ascertain full details of the complaint. The whistleblower may ask a colleague to attend this meeting with them.
- iv. The appointed person(s) will look fairly into the complaint including seeking the views on the matter from any person to whom the complaint refers. The appointed person(s) may seek advice from others, and will complete a report and may seek additional advice to assist in coming to a decision.
- v. A response will then be given to the whistleblower who complained summarising the findings and recommendations of the report and outlining the actions which are proposed to address the complaint.
- vi. The employee/volunteer will be responded to no later than six weeks after receipt of the complaint. If for exceptional reasons it is not possible to adhere to this timescale, the complainant will be informed in writing of the reason as soon as possible.

19. If the employee/volunteer is concerned that their line manager is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the board, they should inform the CEO/Diocesan Secretary (or the

Chair of the House of Laity), who will arrange for another manager to review the investigation carried out, make any necessary enquiries and make their own report to The Board as in stage 2 above. If for any other reason the employee/volunteer does not wish to approach their line manager they should also in the first instance contact the CEO/Diocesan Secretary (or if the wrongdoing concerns that individual, then the Chair of the House of Laity).

20. Any allegation will be treated with the strictest confidence and the identity of the employee/volunteer will not be disclosed without their prior consent.
21. If on conclusion of stages 1, 2 and 3 the employee/volunteer reasonably believes that the appropriate action has not been taken, they should report the matter to the appropriate authority.

Contact Details

22. CEO/Diocesan Secretary (Jonathan Wood) – Jonathan.Wood@leeds.anglican.org
23. Chair of the House of Laity (Matthew Ambler) – Matthew.Ambler@leeds.anglican.org