**INSERT LOGO**

**Speaking Out (Whistleblowing) Policy and Procedure**

**Status of Policy**: Non-Contractual

**Policy applies to:** XXXX (e.g. employees and Volunteers of XXX Parish)

**Review Date:** 31 May 2018

**1. Introduction**

The (Insert name of Parish) recognises that there may be times where you personally feel that there is something seriously wrong within the organisation. It is important that you feel empowered to come forward and raise concerns without fear of intimidation and that a culture of openness is fostered.

The (Insert name of Parish) is committed to developing a culture of openness and accountability and takes all forms of alleged malpractice, fraud, corruption or abuse very seriously. We are very concerned about the potential effect of these matters on the services we provide.

It is important, therefore, that you feel comfortable raising issues which concern you either about something that has already happened or which you 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. You may be worried that by reporting issues of concern, you are exposing yourself to possible victimisation, disciplinary action or putting your role with the Parish at risk. The (name of Parish) understands these concerns, and this policy has been implemented to reassure you 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 you have such a concern, then you should raise your /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.

**2. Purpose and Scope**

**2.1 Purpose of the policy**

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

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

**2.2 Scope of the policy**

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

**3. Key principles**

The (insert name of Parish) positively encourages anybody who has a concern to speak out. If you have serious concerns you are entitled to - and should - raise them. You need 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).

**3.1 Disclosures “in the public interest”**

Examples of concerns “in the public interest” which you might speak 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 you are concerned about **abuse, harm or neglect** of a **child** or of an **adult at risk** then you should Immediately 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.
* **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 office 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.**

You do not need to have firm evidence before raising a concern, but please explain, as fully as you can, the information or circumstances which have given rise to your concern.

Should the concern relate to another organisation, the manager hearing the concern will raise this with the (insert as appropriate e.g. the Clerk to the Parish Council or to the Vicar/Priest in Charge/Chair of the Parish Council) 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. You will not be discriminated against or victimised for raising concerns which you 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.

You have the right to be accompanied by a colleague at any time during the process. Consideration will also be given to allowing you 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.

**3.2 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 [Insert name of Parish]). 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 manager about using a Grievance Policy, or Dignity at Work Policy to address their concerns.

**4. Duties, roles and responsibilities**

**4.1 Managers**

All 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.

**4.2 Staff**

Every member of [insert name of Parish] staff has a responsibility to raise concerns providing s/he has a reasonable belief that malpractice and/or wrongdoing has occurred.

**4.3 The Parish Council**

The Parish Council 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.

**4.4 Leads for the Speaking Out Policy**

The [insert name of Parish} leads for the Speaking Out Policy are the insert as appropriate e.g. Clerk to the Parish Council/ Vicar/Priest in Charge, Chair of the Parish Council 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.

Where appropriate:

On behalf of the Parish Council, the insert e.g. Finance Committee/Staffing Committee will receive an annual report of all Speaking Out cases raised , via the insert e.g. Clerk to the Parish Council/Chair of the Parish Council , in order to monitor progress of investigations and summary outcomes of individual cases on a regular basis.

**5. Confidentiality**

If you wish to keep your identity confidential then, as far as is possible, it will not be disclosed without your consent.

If 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 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 Parish Council is required by law to break that confidentiality. In such circumstances you would be informed of this course of action and a support plan would be mutually agreed.

**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
* Add any other relevant policies

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

**Speaking Out (Whistleblowing) Procedure**

1. **Introduction**

To support the Speaking Out Policy, this Procedure sets out both informal and formal processes and supporting information. A summary flowchart of the process can be found at Appendix A.

1. **Procedure – how to raise concerns**

You can raise concerns under the Speaking Out policy either informally or formally. See section 2.1 to 2.2.2 below.

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 the 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
* 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 the person you are approaching, with your name, your work location (or if not an employee, then your home address) and contact details.

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

In both informal and formal stages of the procedure, the (insert as appropriate e.g. manager/officer/office holder) to whom you raise your concerns will discuss with you how feedback can be given (unless you have chosen to raise your concerns anonymously). Some investigations take longer than others, but the (insert as appropriate e.g. manager/officer/office holder) will give you feedback (wherever possible, within the time frames indicated in the procedure), and will let you know, if the investigation is not yet complete, when you can expect to receive more feedback.

**NB** If you believe there are strong reasons why you should not approach your [insert as appropriate e.g. Manager or the Clerk of the Parish Council] (informal stage), or the next line manager or [INSERT as appropriate e.g. Chair of the Parish Council] (stage one – formal process) then you can approach the [insert as appropriate e.g. Vice Chair of the Council or the Chair of the Finance Committee/Staffing Committee ] (stage 2 – formal process) without following the earlier stages of the procedure.

**2.1 Raising a concern informally**

**Informal Process**

You can raise your concerns by speaking with/writing to:

• The (insert as appropriate e.g. manager/officer/office holder) who is responsible for the area of work which you are concerned about.

• Your own manager (if this is somebody different) or to the (insert as appropriate e.g. Clerk of the Parish Council)

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

If you are raising a concern and you don’t want anybody other than the person you 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

Make sure that you say if it is important for you to remain anonymous.

If you do not feel strongly that your concern must be raised anonymously but you would like your identity to be kept confidential (not disclosed without discussing it with you first) then explain this, when raising your concern.

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

If you speak with a manager then they will either:

* arrange for the concerns to be looked into/investigated *or*
* direct you 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 you - within 5 working days where possible. The manager will also discuss with you how you will receive feedback.

Your identity will not be disclosed without your permission unless there is a requirement to do so (for example for safety or legal reasons) In such circumstances you will be informed of this course of action and a support plan will be mutually agreed.

We hope that this will resolve your concerns. If it does not then you should move to **the formal process** – set out below.

**2.2 Raising a concern formally**

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

* + 1. **Stage 1 – formal process**

If you are dissatisfied with the outcome of the Informal Stage or don’t think that an informal process is appropriate you can move on to Stage 1 of the formal process.

**2.2 Raising a Concern Formally**

**2.2.1 Stage 1**

**Stage 1 – formal process**

You can raise your concerns formally at stage 1 by writing to the next line manger or the [insert as appropriate e.g. Chair of the Parish Council] or, if you think it is inappropriate to approach these managers, to the[insert as appropriate e.g. Vice Chair of the Council] , explaining your concerns. When writing to raise a concern you should mark the envelope “strictly confidential – for the attention of addressee only”.

If you are raising a concern formally, and you don’t want anybody other than the person you 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

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

Make sure that you say if it is important for you to remain anonymous.

If you do not feel strongly that your concern must be raised anonymously but you would like your identity to be kept confidential (not disclosed without discussing it with you first) then explain this, when raising your concern.

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

The person you have written to will meet with you within five working days of receipt of your communication.  They may request that an independent witness is also present – you can choose whether to agree to this. The matters you raise 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 you – wherever possible, within five working days of the meeting. The manager will also discuss with you how you will receive feedback.

Your identity will not be disclosed without your permission unless there is a requirement to do so (for example for safety or legal reasons) In such circumstances you will be informed of this course of action and a support plan will be mutually agreed.

We hope that this will resolve your concerns. If it does not then you should move to **the formal**

 **process stage 2** – set out below.

* + 1. **Stage 2 – formal process**

**2.2.2 Stage 2 – Formal Process**

If you are dissatisfied with the response you have received at formal stage 1 you can move on to stage 2 of the formal process. You may also move directly to stage 2 if you believe that there are strong reasons why you should not approach [insert as appropriate e.g. your Manager, or the Clerk of the Parish Council (informal stage), or the next line manager or INSERT as appropriate e.g. Chair of the Parish Council (stage one – formal process) then you can approach the [insert as appropriate e.g. Vice Chair of the Council or the Chair of the Finance Committee/Staffing Committee ](stage 2 – formal process) without following the earlier stages of the procedure.

**2.22. Stage 2**

**Stage 2 – formal process**

You can raise your concerns formally at stage 2 by writing to the[insert as appropriate e.g. Vice Chair of the Council] , **or** if this is inappropriate, **or** you have already approached this person, to the [insert as appropriate e.g. Chair of the Finance Committee/Staffing Committee], explaining your concerns. When writing to raise a concern you should mark the envelope “strictly confidential – for the attention of addressee only”.

If you are raising a concern formally, and you don’t want anybody other than the person you 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

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

Make sure that you say if it is important for you to remain anonymous.

If you do not feel strongly that your concern must be raised anonymously but you would like your identity to be kept confidential (not disclosed without discussing it with you first) then explain this, when raising your concern.

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

The person you have written to will arrange to meet with you within ten working days of receipt of your communication.  They may request that an independent witness is also present – you can choose whether to agree to this. The concerns you raise 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 you within five working days of the meeting, wherever possible. There will be a discussion about how you will receive feedback.

Your identity will not be disclosed without your permission unless there is a requirement to do so (for example for safety or legal reasons) In such circumstances you will be informed of this course of action and a support plan will be mutually agreed.

**Appendix A – Procedure Flowchart**

S/he will arrange an interview with you, within ten working days and will fully review your concern and may arrange an investigation. You will receive feedback as appropriate.

**Formal Stage 2 of Speaking Out**Raise your concerns in writing to the e.g. Vice Chair of the Council or, if this is inappropriate, (or you have already approached this person) to e.g. Finance/Staffing Committee Chair. .

S/he will arrange an interview, in the strictest confidence, with you, within five working days. The matter you raise will be reviewed, fully considered and may be formally investigated.

**Formal Stage 1 of Speaking Out**Raise your concerns in writing to the next line manager or to the [ e.g. Chair of the Parish Council} , or if this is inappropriate to, to the [e.g. Vice Chair of the Council]Committee.

Wherever possible, feedback will be provided as appropriate (taking account of the confidentiality of others). If you are unhappy with the outcome of Formal Stage 1 then you can move on to:

Your concern will be assessed and looked into (e.g. internal review, informal investigation or more formal investigation) OR you may be directed to the Grievance or Dignity at Work Policies if this is more appropriate.

**Informal Stage of Speaking Out**Raise your concern by speaking with (or writing to) your own manager or the manager who is responsible for the area of work which you are concerned about, or with [insert as appropriate e.g. the Clerk to the Parish Council]

Wherever possible, feedback will be provided as appropriate (taking account of the confidentiality of others). If you are unhappy with the outcome of the Informal Stage or don’t think an informal stage is appropriate you can move on to:

No

Yes

Contact the Diocesan Safeguarding Adviser (0117 9060100) or, out of hours, the Churches’ Child Protection Advisory Service (0845 1204550) or the Police or Local Authority.

Is it a **safeguarding concern** relating to harm to, or abuse of, a child/adult at risk?

**Worried that something is wrong?** e.g. risk, wrongdoing, malpractice, fraud

**Speaking Out (Whistleblowing)**

**Appendix B**

 **Frequently Asked Questions**

**What is Speaking Out (Whistleblowing)?**

Speaking Out (Whistleblowing) means that a member of staff 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.

**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 [insert name of parish] 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.

**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 office 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.

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 identify 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

#### 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 recommend 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.pcaw.co.uk](http://www.pcaw.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 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 [insert examples] to explain the concerns you have. This manager will then contact the appropriate person in the other parish /organisation to advise them of your concerns.