



Bedfordshire, Essex and Hertfordshire District

Whistleblowing Policy

1. The District seeks to operate all aspects of business to high standards of conduct and integrity. In the event that a staff member becomes aware of activities that give cause for concern, the District has established the following procedure, which provides a framework to allow concerns to be raised in confidence and to allow for a thorough and appropriate investigation of the matter. The District is committed to creating a climate of trust and openness, so that a staff member who has a genuine concern or suspicion can raise the matter with full confidence that it will be appropriately considered and resolved. Any individual who makes a disclosure of wrongdoing or malpractice will be treated with respect and will be protected against victimisation, provided that the staff member had reasonable grounds to suspect the wrongdoing; anyone who victimises a whistleblower will be subject to the District's disciplinary procedure. This policy applies to all District staff members, whether permanent or temporary.
2. What is whistleblowing? A disclosure made to someone in authority alleging corruption, malpractice or wrongdoing. The act of blowing the whistle is 'making a disclosure in the public interest.' The District considers that the following types of activity or behaviour should be dealt with under this policy: manipulation of accounting records and finances, inappropriate use of assets or funds of which the District is the managing trustee, decision-making for personal gain, any criminal activity, abuse of position, fraud and deceit, serious breaches of procedure which may advantage a particular party or any actions likely to bring the reputation of the Church into question.
3. The Public Interest Disclosure Act 1998 provides protection for employees who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in good faith by an employee who has a reasonable belief that: a criminal offence (including fraudulent and corrupt behaviour, e.g. theft, fraud or malpractice), 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 employee to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient.
4. The employee has no responsibility for investigating the matter - it is the District's responsibility to ensure that an investigation takes place. An employee who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because he/she has made a disclosure.
5. In the first instance, discuss any concerns with the District Chair. An informal approach to the District Chair will be treated in the strictest confidence. It will not result in a report to anyone else without the whistleblower's agreement, except where the District Chair believes that the issues raised are so serious that further action may be required. Where this is the case, the

District Chair will refer it to the Secretary of Conference. If the staff member feels it is inappropriate to raise the concerns with the District Chair, for example if the concerns are about the District Chair's actions, or if they are so serious that they should be escalated to someone more senior, then they should speak to the District Policy Committee Secretary, who will refer the matter to the Secretary of Conference. All such approaches will be treated in the strictest confidence. If the whistleblower remains unhappy about the speed or conduct of any further action taken or the way in which their concerns have been resolved, he/she should refer the matter to the Secretary of Conference.

6. A staff member must not approach individuals involved in his/her disclosure directly or attempt to investigate the matter personally. Disclosures to the press will not be considered reasonable. They will constitute misconduct and will be treated as a disciplinary matter in accordance with the District's disciplinary policy. A potential whistleblower can, at any stage of the above procedure, seek legal advice or speak to Protect for guidance on the helpline 020 3117 2520 or whistle@protect-advice.org.uk.
7. Dealing with disclosures. If a staff member reports a disclosure, the need for confidentiality will be respected wherever possible, although any concern raised under this procedure will need to be properly documented. The District believes that all staff members should feel able to put their name to the allegations which they raise, as concerns expressed anonymously are difficult to investigate. The action taken in response to a disclosure will depend on the nature of the concern. By way of example, the matters raised may result in one or more of the following: no action required; action being taken under other District policies and/or procedures; an internal investigation; a referral to the police; a referral to the District's external auditors; a referral to the Charity Commission; an independent enquiry.
8. The responsible person to whom the disclosure is made (the District Chair or the District Policy Committee Secretary) will make a detailed report of the disclosure and ask the staff member to provide a written statement describing the precise nature of the allegations. Upon receipt of the written statement, they will decide whether any further action may be required. Where it is, they will refer it to the Secretary of Conference and write to the staff member within five working days of making that decision. In their letter, they will acknowledge receipt of the concern, provide information on who it has been referred to and details of who the staff member should contact if they have further questions.
9. Internal investigation. Where further action is required under this policy in relation to a staff member's concern, this will typically, in the first instance, take the form of an internal investigation. The investigating officer will be the District Policy Committee Secretary or the Synod Secretary. Alternatively, a suitably qualified independent professional may be asked to undertake the investigation. During the investigation, the staff member who reported the disclosure may be called upon for interview. They will also be given appropriate updates of progress made during the investigation, whilst bearing in mind the need to respect the confidentiality of other staff members.
10. Outcomes. The staff member will be given a prompt and thorough written explanation of the outcome of the investigation and any actions that will result from it. The investigating officer compiles a report. The report shall be presented to the District Policy Committee. The investigating officer will follow through to ensure there have been appropriate outcomes. The

District recognises that there may be matters which cannot be dealt with internally and external authorities may need to become involved, including the police and the Charity Commission. Where this is necessary, the District reserves the right to make such a referral without the reporting staff member's consent.

11. What if the whistleblower is dissatisfied with the outcome? The whistleblower may write to the Secretary of Conference within 10 days of receiving written notice of the outcome in order to appeal. The Secretary of Conference will arrange for a panel to meet with the whistleblower and hear the full investigation and the appeal. The outcome of the appeal will be the final stage in the internal process and this will be the final decision
12. Protection of whistleblowers. The District will not tolerate any staff member being subjected to a detriment as a result of their making a disclosure in good faith. In the event that any staff member believes that they have been subject to a detriment for this reason, they must inform the District Chair or the District Policy Committee Secretary immediately. If anyone seeks to discourage a staff member from coming forward to express a genuine concern, the District will treat this as a disciplinary matter. In the same way, anyone who criticises or victimises a staff member or otherwise subjects them to a detriment for raising a concern will be dealt with severely.
13. Unfounded and malicious reports. If it becomes clear that the procedure under this policy has not been invoked in good faith, this will constitute misconduct and shall be treated as a disciplinary matter in accordance with the District's disciplinary policy. However, any staff member who, in good faith, makes allegations that turn out to be unfounded will not be penalised for being genuinely mistaken.
14. Conclusion. The District is confident that the existing good practice and internal controls will ensure that cases of suspected fraud or impropriety rarely occur. This Whistleblowing Policy is provided as a reference document and a commitment that any concerns raised will be taken seriously and actioned promptly.
15. Useful links. Protect Advice line 020 3117 2520 or whistle@protect-advice.org.uk Government Website GOV.uk – Whistleblowing Provides detailed information about: - Protected disclosures - Routes of disclosure - Prescribed persons - Disclosure in exceptional cases and serious case

Adopted at a Circuit Policy for North Bedfordshire Methodist Circuit

Date

9/9/2024

Signed

Adopted by North Bedfordshire Methodist
Circuit for 2 years

North Bedfordshire Circuit Meeting September 2024
Issues requiring circuit action

1. Adoption of the Connexional and District policies as listed below for 2 years unless they need updating before.

Issue

To approve the Connexional and District policies as follows:

- Connexional Safer Recruitment
- District Equality Diversity and Inclusion
- Connexional Anti Bullying Policy
- Connexional Working with Victims and Survivors
- District Lone Worker Policy
- District Whistle Blowing Policy

Timing

Immediate

Recommendation

All of the above policies are approved for 2 years, unless revision is needed before.

Background and argument

All policies to be agreed where no changes are needed at the September North Bedfordshire Methodist Circuit Meeting every two years.

Next Steps

Proposed by *Stephen Gull*

Seconded by..... *Phil Thomas*

Abstained.....

Agreed by the Meeting

Signed Rev Michael Giles *[Signature]*
Superintendent Minister
9th September 2024