

WHISTLEBLOWING POLICY

Last updated: May 2025

INTRODUCTION

This policy applies to all staff and volunteers who work for ChaplaincyPlus whether full-time or part-time. All organisations face the risk of things going wrong or of unknowingly harbouring wrongdoing. We have a duty to identify and take measures to remedy all wrongdoing particularly with regard to issues of fraud.

The purpose of this policy and procedure is to outline ways in which all ChaplaincyPlus employees and volunteers can express concerns about wrongdoing and to encourage employees to raise these at an early stage and in an appropriate way in line with the Public Interest Disclosure Act 1998.

The Board of Trustees is committed to managing the organisation in the best way possible. This policy is in place to reassure staff that it is safe and acceptable to speak up and enable concerns to be raised 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.

It can be difficult to know what to do when these concerns are about unlawful conduct, financial irregularities, fraud*, inappropriate moral conduct, health and safety issues, or if you feel these issues are being inappropriately concealed. By encouraging a culture of openness within ChaplaincyPlus we believe that we can prevent any form of wrongdoing before it happens.

Grievance: It should be noted that this policy is not our normal grievance procedure. If you have a complaint about your own personal circumstances then you should use the grievance procedure. If you have concerns about wrongdoing within the organisation then you should use the procedure outlined below.

1. Whistleblowing Procedure:

- 1.1. If an employee/volunteer is concerned about any form of wrongdoing they should normally first raise the issue with the Network Support Manager. There is no special procedure for doing this – they can speak to them about the problem or put it in writing if preferred.
- 1.2. At whatever level the issue is raised, they should declare whether they have a personal interest in the issue at the outset. The Network Support Manager will inform them if their concern falls more properly within the grievance procedure.
- 1.3. If they feel they cannot tell the Network Support Manager, for whatever reason, they should raise the issue with the chair of Trustees for ChaplaincyPlus. The Board of Trustees are entrusted with the duty of investigating staff concerns about illegal, improper or unethical behaviour.

1.4. Responding to whistleblowing

- 1.5. After the employee/ volunteer has raised a concern ChaplaincyPlus will decide how to respond in a responsible and appropriate manner. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised.
- 1.6. ChaplaincyPlus will, as far as possible, keep the employee/ volunteer who raised the concern informed of the decisions taken and the outcome of any enquiries and investigations carried out. However, we will not be able to inform you of any matters which would infringe our duty of confidentiality to others.

1.7. Protection of the Whistle blower

- 1.8. The management and Board of Trustees of ChaplaincyPlus are committed to this policy. If the policy is used to raise a genuine concern we give you our assurance that the person raising the issue will not suffer any form of retribution, victimisation or detriment as a result of their actions.
- 1.9. Concerns will be treated seriously and actions taken in accordance with this policy. If requested, we will do our utmost to treat the matter in confidence however, it is not possible to guarantee confidentiality.
- 1.10. In some circumstances ChaplaincyPlus may decide that we ought to reveal the identity of the person making the allegations in order to assist in the investigation into the matter. They will be advised beforehand if this is the case.
- 1.11. ChaplaincyPlus will give feedback on any investigation and be sensitive to any concerns the whistle-blower may have as a result of any steps taken under this procedure.
- 1.12. Occasionally it is appropriate to report externally but before doing so we strongly urge seeking external advice. Protect offers a confidential helpline 02031172520, <https://protect-advice.org.uk>

**Fraud: for the purpose of this policy refers to where an individual has undertaken, or intends to undertake, actions in order to obtain gain for him/herself or another, or cause loss to another, or expose another to risk of loss.*

The term 'fraud' encompasses:

- *Fraud by false representation;*

- *Fraud by failing to disclose information;*
- *Fraud by abuse of position.*