

## Whistleblowing Policy

### Intention

The Well Church is committed to being open, honest and accountable. It encourages a free and open culture in its dealings between the Trustees and those working in The Well Church, both employees and volunteers. This policy aims to help the Trustees, employees and volunteers to raise any serious concerns they may have about colleagues or their employer with confidence and without having to worry about being victimised, discriminated against or disadvantaged in any way as a result. It is written in the context of the Public Interest Disclosure Act 1998 which protects employees who 'blow the whistle' on malpractices within their organisation.

As laid out in the Public Interest Disclosure Act, all employees, trainees, agency staff, contractors and homeworkers, are protected from repercussions of whistleblowing, regardless of length of service or age.

### What types of concerns?

The policy is intended to deal with serious or sensitive concerns about wrongdoings such as the following:

- a criminal offence
- a failure to comply with any legal obligation
- a failure in the protection of children or vulnerable adults
- a miscarriage of justice
- a health and safety risk to an individual
- damage to the environment
- or concealment of the above.

It is not necessary for individuals who raise the concern to prove the wrongdoing that is alleged to have occurred or is likely to occur.

However, if an individual knowingly or maliciously makes an untrue allegation (eg. in order to cause disruption within The Well Church), The Well Church will take appropriate disciplinary action against them. It may constitute gross misconduct.

Individuals should note that they will not be protected from the consequences of making a disclosure if, by doing so, they commit a criminal offence.

Our Equality and Discrimination policy offers protection to workers against harassment, bullying and discrimination.

### How to raise a concern in the workplace

The person designated to handle whistleblowing concerns is Tim Aston, Chair of Trustees, and shall be known as the Whistleblowing Officer ([tim@thewellchurch.org](mailto:tim@thewellchurch.org)).

Individuals should, in most cases; first report their concern to their line manager, who is expected to respond to that matter. If the relevant manager cannot deal with the matter, he or she will refer the concern to the Whistleblowing Officer.

Dependent on the seriousness and sensitivity of the matter, and who is suspected of the wrongdoing, the individual can, if necessary, report directly to the Whistleblowing Officer. If the matter concerns the Whistleblowing Officer, it should be raised with the Trustees.

If the matter is not dealt with internally, whistle-blowers can disclose to appropriate external bodies. Matters concerning accountability of Church leadership may also be raised with Matt Partridge, Emmanuel Church Oxford, who provides accountability via the Catalyst Network.

Individuals are encouraged to raise their concerns in writing, where possible, setting out the background and history of their concerns (giving names, dates and places where possible) and indicating the reasons for their concerns.

The Public Interest Disclosure Act 1998 protects disclosures made to prescribed bodies such as the Charity Commission. (A full list can be found at [protect-advice.org.uk](http://protect-advice.org.uk), who also have a free hotline available).

### Protecting the individual raising the concern

If an individual raises a concern which they believe to be true, The Well Church will take appropriate action to protect the individual from any harassment, victimisation or bullying. Employees who raise a genuine concern under this policy will not be at risk of losing their job, nor will it influence any unrelated disciplinary action or redundancy procedures.

The matter will be treated confidentially if the individual requests it and their name or position will not be revealed without their permission unless The Well Church has to do so by law. If in other circumstances the concern cannot be resolved without revealing the individual's identity, the Whistleblowing Officer will discuss with the individual whether and how to proceed.

Concerns raised anonymously tend to be far less effective but the Whistleblowing Officer will decide whether or not to consider the matter, taking into account:

- the seriousness of the matter
- whether the concern is believable
- whether an investigation can be carried out based on the information provided.

### How The Well Church will deal with the concern

How the concern will be dealt with will depend on what it involves. It is likely that further enquiries and/or investigation will be necessary. The concern may be investigated by The Well Church's Whistleblowing Officer, the Trustees, through the disciplinary process or it may be referred to the police, other agencies such as Social Services, an external auditor, or an independent investigator.





It may be necessary for the individual to give evidence in criminal or disciplinary proceedings.

The Well Church will give the individual feedback on the progress and outcome of any investigation wherever possible.

If the suspicions are not confirmed by an investigation, the matter will be closed. Staff will not be treated or regarded any differently for raising the concern, and their confidentiality will continue to be protected.

**Review**

We will ensure the Whistleblowing policy is upheld by reviewing it annually.

	Name	Date
This policy was written by:	Sarah Algar & Martin Bull	15/09/2021
It was revised by:		
It is due for revision:	September 2022	
Trustee signatures:	 Laura Green	28/10/2021
	 Tim Aston	17/11/2021
	 Saul Algar	01/12/2021
	 Martin Bull	01/12/2021