

Paper T2

URC Whistleblowing Policy

Safeguarding Committee

Basic information

Contact name and email address	Roger Jones, Convenor, rjones@urcsouthern.org.uk Sharon Barr, Secretary sharon.barr@urc.org.uk
Action required	Adoption.
Draft resolution(s)	Resolution 70 General Assembly adopts the Whistleblowing Policy outlined in paper T2 of General Assembly 2023 and commends it to church meetings, E meetings and Synods for consideration, implementation and dissemination.

Summary of content

Subject and aim(s)	<p>The URC Whistleblowing Policy aims to give all areas of the Church a basis for supporting whistleblowers and guidance on managing complaints that are raised through this route.</p> <p>The review of Good Practice 4 identified a need for a Whistleblowing Policy that covered all areas of the Church, which was endorsed by the General Secretariat at the time. Mary Fallah, the URC's Compliance Officer, has now produced the Whistleblowing Policy.</p>
Main points	<p>This policy aims to encourage whistleblowers to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously, investigated as appropriate and their confidentiality respected.</p> <p>It aims to provide whistleblowers with guidance as to how to raise their concerns.</p> <p>This policy aims to reassure whistleblowers that they can raise concerns without fears of reprisals, even if their concern turns out to be mistaken.</p>
Previous relevant documents	
Consultation has taken place with...	<p>The General Secretariat Church House Connective Team Synod Moderators Synod Clerks</p>

	The Law and Polity Advisory Group Synod Safeguarding Practice Group (consisting of Synod Safeguarding Officers).
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Summary of impact

Financial	None.
External (eg ecumenical)	N/A.

United Reformed Church Whistleblowing Policy

1. Introduction

1.1 The United Reformed Church and its associated bodies ('the URC', 'we' 'us', 'our') are committed to openness, accountability, and integrity. In line with this commitment, we expect employees, office holders, church members, volunteers, third parties or those contracted to provide services to the URC who have serious concerns about any aspect of our work, to come forward and voice those concerns with the knowledge that, if made in good faith, their action will be viewed positively. This will assist us in addressing the concerns and thereby avoid more serious regulatory breaches or reputational damage.

1.2 About this policy:

- This policy does not form part of any employee's contract of employment, and it may be amended at any time, subject to agreement with the General Assembly or the Assembly Executive, acting on behalf of the General Assembly.
- It sits alongside other policies within the URC. It is not a part of a hierarchy of policies to be used to raise any type of complaint. This policy applies only to issues pertaining to whistleblowing.
- This policy aims to encourage whistleblowers to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously, investigated as appropriate and their confidentiality respected.
- It aims to provide whistleblowers with guidance as to how to raise their concerns.
- This policy aims to reassure whistleblowers that they can raise concerns without fears of reprisals, even if their concern turns out to be mistaken.

2. What is whistleblowing?

2.1 Whistleblowing is the term used regarding the internal or external disclosure of suspected wrongdoing or dangers in relation to our activities, in the interest of the public. This includes bribery, fraud or other criminal activity; facilitation of tax evasion; miscarriages of justice; health and safety risks; damage to the environment; any breach of legal or professional obligations; negligence; and the deliberate concealment of any of the above-mentioned matters. Safeguarding matters concerning vulnerable people in the URC are also included in the definition of whistleblowing.

2.2 Untrue or malicious disclosures

If it is not possible to disclose to the designated person, as the concern may involve them, please speak to the next appropriate designated person.

- 3.1 Whistleblowers can provide oral disclosures, but written disclosures are preferable, as these will make the process more efficient and effective. In the whistleblower's disclosure, they should provide a description of the concerns, including where possible, precise information such as dates, names of those involved, meetings or correspondence which have taken place and reference to relevant documents or policies. They should also mention that they are raising their concerns using the United Reformed Church Whistleblowing Policy.
- 3.2 All concerns will be acknowledged, recorded, and reviewed by the person to whom the disclosure is made and where appropriate investigated.

4. **Confidentiality**

- 4.1 Where possible, the identity of the whistleblower will be protected. There may be circumstances, however, where it may not be possible to proceed without revealing the whistleblower's identity, for example if the whistleblower's evidence is needed in the investigatory process, at a disciplinary or court hearing. Should this be the case, the matter will be discussed with the whistleblower at the earliest opportunity, and they may have the opportunity to withdraw the disclosure if, by continuing with the investigation, their identity would be revealed to the subject of the disclosure. The whistleblower must understand, however, that where a potentially serious disclosure is made, a designated person, on behalf of the URC must investigate to ensure that the URC is taking due care of its people, property, funds, moral and legal obligations. Where necessary, this may continue without the cooperation of the whistleblower.
- 4.2 The need for confidentiality may prevent the designated person from providing the specific details of the investigation or actions taken, to the whistleblower.
- 4.3 The whistleblower should treat any information about the investigation as confidential.
- 4.4 Concerns raised anonymously will be dealt with at the discretion of a designated person, on behalf of the URC.

5. **Investigation and outcome**

- 5.1 Once the whistleblower has raised a concern, a meeting will be arranged to discuss their concern. They may bring someone with them to this meeting, if that person is willing to maintain the confidentiality of their disclosure and any subsequent investigation.
- 5.2 Feedback will then be given as to whether the concern falls within the scope of this policy and how the designated person, on behalf of the URC plans to deal with the matter.
- 5.3 If there is a cause for concern, the designated person will arrange for an investigation. The designated person may appoint another person to undertake the investigation on their behalf.
- 5.4 Where there are existing procedures or policies in place for the investigation of certain allegations, for example those covered by The Manual concerning complaints and discipline, the matter will be dealt with in line with that policy.

5.5 The process

Once a disclosure has been made, the designated person will:

5.5.1 Make a record of its receipt.

5.5.2 Conduct a preliminary review as to whether the disclosure falls under the scope of this policy and whether there is sufficient evidence to suggest that it should be investigated and if so, appoint a person to investigate.

5.5.3 Following the preliminary review, the investigating officer will make a preliminary decision and notify the whistleblower, where it is possible and appropriate to do so that:

- The disclosure will be investigated formally.
- The disclosure has been investigated and relevant action taken.
- The disclosure has been drawn to the attention of the person who has the authority to act on the matter.
- The disclosure has been dismissed as there are no ground for investigation.

5.5.4 Where the initial investigation identifies that a formal investigation is required then:

- An investigation will be carried out by someone with relevant experience appointed by the designated person and as speedily as possible, depending on the complexity of the investigation.

7.22 An atmosphere of openness is encouraged, and support provided to whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment because of raising a genuine concern.

Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

If a whistleblower believes that they have suffered any such treatment, they should inform the relevant designated person.

A whistleblower should not face any threats or retaliation, for raising a concern from anyone working in the URC. Any such behaviour towards a whistleblower could result in disciplinary action. In some cases, the whistleblower could have a right to sue personally for compensation.

8. Important contacts

Key internal and external contacts are in the tables below.

Internal Contacts [to be completed by the local Church if the policy is displayed or made available to local Churches]

Your Church Secretary	[NAME] [TELEPHONE] [E-MAIL]
Church Safeguarding Officer	[NAME] [TELEPHONE] [EMAIL]
Synod Clerk	[NAME] [TELEPHONE] [E-MAIL]
Synod Moderator	[NAME] [TELEPHONE] [E-MAIL]
Secretary to the Synod Trust	[NAME] [E-MAIL]
Synod Safeguarding Officer	[NAME] [TELEPHONE] [EMAIL]

General Secretary	The Revd Dr John Bradbury john.bradbury@urc.org.uk
Secretary to the URC Trust	Sandi Hallam-Jones s.hallam-jones@urc.org.uk

External Contacts: not an exhaustive list. Please contact **Protect** for more.

Charity Commission	Email: whistleblowing@charitycommission.gov.uk Website: www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer
Protect	Helpline: 0203 117 2520 E-mail: info@protect-advice.org.uk Website: www.protect-advice.org.uk
HM Revenue and Customs	Helpline: 0800 788 887 Website: www.gov.uk/government/organisations/hm-revenue-customs/contact/reporting-tax-evasion
Health and Safety Executive	Helpline: 0300 003 1647 Website: www.hse.gov.uk/contact/concerns.htm