



Speaking Out (Whistleblowing) Policy and Procedure

Document Summary

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Document Manager:	The PCC Secretary
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Version control guide:

- 0.1 (1st draft version)
- 0.2 (2nd draft and so on..... 0.3. 0.4 etc)
- 1.0 (Once document has been approved)
- 1.2 (during review/approval of a lifecycle document i.e. policies)
- 2.0 (2nd approved document) and so on.

1. Introduction

The Parish of St James-the-Less, Iron Acton 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 Parish of St James-the-Less, Iron Acton 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 Parish of St James-the-Less, Iron Acton 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 Parish of St James-the-Less, Iron Acton, 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 employees of the Parish of St James-the-Less, Iron Acton. This policy also applies to staff who have left the Parish of St James-the-Less, Iron Acton within a three month period i.e. three months from the last working day at the Parish of St James-the-Less, Iron Acton; to agency staff; staff seconded to work in the Parish of St James-the-Less, Iron Acton; students on placement; other learners; volunteers and sub-contracted staff.

3. Key principles

The Parish of St James-the-Less, Iron Acton 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 disregarded 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 offence 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/church officer hearing the concern will raise this with the Minister or the Lay 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 Parish of St James-the-Less, Iron Acton). 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 the Parish of St James-the-Less, Iron Acton's 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 Parish of St James-the-Less, Iron Acton leads for the Speaking Out Policy are the Minister, Warden's, and the Lay 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.

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

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.

2. 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 manager/churchwarden/minister 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 the manager/churchwarden/minister 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 Manager/Churchwarden (informal stage), or the next line manager or the Minister (stage one – formal process) then you can approach the Minister or Archdeacon (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 person who is responsible for the area of work which you are concerned about
- Your own manager (if this is somebody different) or to the Church of England

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 speaking to know about this yet, it isn't recommended that the concern is raised via email. 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, your identity to be kept confidential (not disclosed without discussing it with you) will be kept confidential when raising your concern.

You can involve your trade union representative, if you have one, in helping you to raise your concern. If you do not have a trade union representative then you may want to consider raising your concern in a meeting by a colleague or (with the permission of the person you are meeting with) 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 days where possible. The manager will also discuss with you how you will be supported.

Your identity will not be disclosed without your permission unless there is a good reason (for example for safety or legal reasons) In such circumstances you will be informed of the action and a support plan will be mutually agreed.

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

2.2 Raising a concern formally

We would like to encourage you to raise your concerns using the informal action (however you choose) unless you feel strongly that the matter is too serious to be dealt with informally and you should use the formal steps of the Speaking Out Policy.

2.2.1 Stage 1 – formal process

If you are dissatisfied with the outcome of the informal process or if it is not 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 manager or, if you think it is inappropriate to approach these managers, to the next level of management. When writing to raise a concern you should mark it confidential – for the attention of addressee only”.

If you are raising a concern formally, and you don't want anybody other than the named recipient to know about this yet, it isn't recommended that the concern is raised in some cases staff other than the named recipient have permission to view it.

You will need to make it clear that you are formally raising a matter of public interest under the Speaking Out Policy and advise of any process you are following (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, your identity to be kept confidential (not disclosed without discussing it with you) when raising your concern.

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

The person you have written to will meet with you within five working days of your communication. They may request that an independent witness is also present. You will be asked whether to agree to this. The matters you raise will be reviewed, fully considered and formally investigated.

The contents of the meeting will be recorded in writing and a copy given to you, if possible, within five working days of the meeting. The manager will also provide you with feedback.

Your identity will not be disclosed without your permission unless there is a compelling reason (for example for safety or legal reasons) In such circumstances you will be asked to agree a plan 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 **process stage 2** – set out below.

2.2.2 Stage 2 – formal process

2.2.2 Stage 2 – Formal Process

If you are dissatisfied with the response you receive at stage 1, you can move to stage 2 of the formal process. You may also move to stage 2 if you have strong reasons why you should not approach the next level of management, the Parish Council (informal stage), or the next level of management, the Parish Council (stage one – formal process), the Vice Chair of the Council or the Chair of the Forum (stage two – formal process) without following the earlier stages.

2.22. Stage 2

Stage 2 – formal process

You can raise your concerns formally at stage 2 by writing to the Minister, if it is appropriate, **or** you have already approached this person, to the Archdeacon, if it is not appropriate. 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 named recipient to know about this yet, it isn't recommended that the concern is raised anonymously because in some cases staff other than the named recipient have permission to know about the concern.

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 want your identity to be kept confidential (not disclosed without discussing it with you), you should 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, you can 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 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 ten working days of the meeting, wherever possible. There will be a discussion about the findings and 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 the course of action and a support plan will be mutually agreed.

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

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

No

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:

Informal Stage of Speaking Out
concern by speaking with (or writing to) your own manager for the area of work which you are concerned about

Your concern will be assessed and looked into (e.g. internal review or formal investigation) OR you may be directed to the Grievance or

Speaking Out (Whistleblowing)

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 Parish of St James-the-Less, Iron Acton 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 offence 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 identity 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 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, such as the minister, 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.