**Whistleblowing Policy**

August 2021

St Paul’s Cathedral is committed to conducting its business within the framework of Christian values; with integrity, honesty and openness, in addition to operating within the country's laws and regulations. The Cathedral also expects all employees and volunteers to co-operate in this by adhering to all laws, regulations, policies and procedures and maintaining high standards of conduct. However, it recognises that the Cathedral, like all organisations, may face the risk of unethical or illegal conduct at work. Therefore, the Cathedral encourages staff, volunteers, agency staff or contractors to be watchful for such conduct and to report anything that they become aware of so that it can be properly dealt with.

This policy sets out the way in which individuals may raise such concerns and how those concerns will be dealt with. This policy should not be used for grievances relating to an individual’s own contract of employment - in these cases, they should use the Grievance Procedure.

If an individual is uncertain whether something is within the scope of this policy, they should seek advice from the Head of Human Resources.

**What is whistleblowing?**

‘Whistleblowing’ is the disclosure of information which relates to suspected wrongdoing by workers, suspected wrongdoing in the way the Cathedral is run, or a risk to health and safety. We can also think about it as ‘speaking up’ about concerns.

A ‘whistleblower’ is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the Cathedral’s activities you should report it to the Registrar or the Head of Human Resources.

However, if your concern is about the persons named in this policy as being the recipient of your concern, for example, if your concern is about the Registrar, speak to the Head of Human Resources; if your concern is about the Head of Human Resources, speak to the Canon-in-Residence. The details for who the Canon-in-Residence (CiR) is can be found in the Outlook Calendar, called ‘Ministers Planning’, or via the Artifax system; you can speak directly to the CiR by calling the CiR number (detailed at the end of this policy).

You may also speak to the Safeguarding Advisor, in the first instance, if your concern relates to a child, or vulnerable adult, or if you believe that the action which concerns you will render an adult vulnerable.

In accordance with the provisions of the Public Interest Disclosure Act 1998, every employee is expected to advise the Registrar, in the first instance, should they become aware of any of the following:

a) an employee of St Paul’s Cathedral breaking or proposing to break any law or regulation;

b) an employee of St Paul’s Cathedral acting dishonestly in any way;

c) Cathedral procedure or policy being broken;

d) any wrongdoing;

e) an act creating risk to health and safety or any matter which seems likely to harm an employee, visitor, member of the public, the environment, etc.; or

f) any possibility or suggestion that one of the items set out in item (a) to (e) has occurred and is being covered up.

It is particularly urgent and important in matters concerning the safety of those on our premises (whether employees, volunteers, contractors, or visitors) that anyone who becomes aware of a hazard or dangerous occurrence is expressly required to notify the Clerk of the Works or the Registrar before making any other report (e.g. to an outside body) not least so that immediate action can be taken if necessary to remove the hazard.

Should your concern relate to the actions of a third party, such as a contractor, supplier or service provider, the law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact the Registrar or one of the other individuals set out below for further guidance.

**Investigation and outcome**

Once you have raised a concern, an initial assessment to determine the scope of any investigation will be carried out promptly. Please note that you may be required to attend additional meetings in order to provide further information. You will be informed of the outcome of the assessment.

In some cases, an investigator or team of investigators may be appointed by the Registrar or Head of Human Resources including staff with relevant experience of investigations or specialist knowledge of the subject matter. You may be asked to give a written statement or asked to comment on any additional evidence obtained.

The aim will be to keep you informed of the progress of the investigation and its likely timescale.

On conclusion of any investigation, a report will be written for the Registrar or Head of Human Resources with any necessary action or recommendations for change detailed to enable the Cathedral to minimise the risk of future wrongdoing. If disciplinary action is required, the disciplinary procedure will commence. If no action is to be taken, this will be detailed. Sometimes the need for confidentiality may prevent you from being given specific details of the outcome of the investigation or any disciplinary action taken as a result. However, the aim will be to give you as much information on the findings as safely possible. You should treat any information given to you about the investigation as confidential.

If on conclusion of the investigation, you are not happy with the way in which your concern has been handled or you believe appropriate action has not been taken, you can raise it with the Dean, who may arrange for a second investigation to be carried out.

**Confidentiality**

Any matter raised under this policy will be investigated thoroughly and confidentially, so it is hoped that staff or volunteers will feel able to voice whistleblowing concerns openly, rather than make disclosures anonymously. This is because proper investigation may be more difficult or impossible if further information cannot be obtained from you. It is also more difficult to establish whether any allegations are credible.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Registrar or the Head of Human Resources and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from the Registrar, or the Protect helpline - their contact details are at the end of this policy. However, we do understand that speaking up can cause anxiety and we will keep your identity confidential if you request that; in the event that your identify needs to be disclosed in a subsequent investigation, we will speak to you first.

**Protection and support for whistleblowers**

It is understandable that whistleblowers are sometimes worried about possible repercussions. Therefore, the Cathedral undertakes to:

* hold whistleblowers harmless and to protect them from any personal claims and from any victimisation, harassment or bullying as a result of raising a matter under this policy. The aim is that continued employment, future opportunities or training of any whistleblower should not in any way be harmed or hindered as a result of raising their concern (whether the concern reported proves to be true or not) provided the reporting was carried out in good faith.
* protect whistleblowers from any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of Human Resources immediately. If the matter is not remedied you should raise it formally using the Grievance Procedure.
* address and consider as gross misconduct any hostile action against a worker as a result of a disclosure intended to be protected by this policy, whether the perpetrator is affected by the disclosure or no.

This policy will apply where a disclosure is made in good faith and where the individual raising the concern reasonably believes that the information disclosed and any allegation contained in it are substantially true.

If any disclosure is made in bad faith (for instance, in order to cause disruption within the Cathedral), or concerns information which employees do not substantially believe is true, or indeed if the disclosure is made for personal gain, then such a disclosure will constitute a disciplinary offence for the purposes of the Cathedral’s Disciplinary Procedure and may constitute gross misconduct for which summary dismissal is the sanction.

**Protect - *formerly* Public Concern at Work**

In most cases, you should not find it necessary to raise your concerns with anyone externally, although the law recognises that in some circumstances it may be appropriate for you to do so (e.g. reporting to a regulator). It will very rarely, if ever, be appropriate to alert the media.

We strongly encourage you to seek advice before reporting a concern to anyone external. Protect - *formerly* Public Concern at Work - operates a confidential helpline and can provide advice for raising a concern and a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

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| **Registrar** | Emma Davies  020 7246 8311 (or extension 311)  registrar@stpaulscathedral.org.uk |
| **Head of HR** | Melanie Barker  020 7246 8351 (or extension 351)  mbarker@stpaulscathedral.org.uk |
| **Canon-in-Residence**  **Safeguarding Advisor**  **Clerk of the Works (Safety Officer)**  **Assistant Safety Officer /**  **Works Office Manager** | See Ministers Planning Outlook calendar, or  Artifax, or phone  02038878869  Louise Wilcox  [lwilcox@stpaulscathedral.org.uk](mailto:lwilcox@stpaulscathedral.org.uk)  07708 255144  Martin Fletcher  020 7246 8309  [mfletcher@stpaulscathedral.org.uk](mailto:mfletcher@stpaulscathedral.org.uk) /  clerkoftheworks@stpaulscathedral.org.uk  Laura Hughes  020 7246 8306 (or extension 306)  [worksoffice@stpaulscathedral.org.uk](mailto:worksoffice@stpaulscathedral.org.uk) |
| **GOV.UK website re: whistleblowing**  **Protect (free, confidential whistleblowing advice)** | <https://www.gov.uk/whistleblowing>  020 3117 2520  whistle@protect-advice.org.uk  Website: www.pcaw.co.uk |