

# Whistleblowing Policy

March 2024

The Corporation of the Cathedral Church of St Paul in London (the employer) is known as St Paul's Cathedral and referred to in this document as the "Cathedral", "we" or "us".

Volunteers, agency workers, contractors, subcontractors and suppliers are referred to as "other individuals".

## Introduction

Whistleblowing is 'speaking up', passing on information or making a disclosure about concerns relating to past, present or likely future wrongdoing by Cathedral employees, casual workers, clergy, licensed ministers and other individuals and in doing so, is an act in the public interest. Concerns may relate to how the Cathedral is run (for example suspected fraud, breach of policies, reputation damage, criminal activity) or a risk to health and safety.

We recognise that raising a whistleblowing concern can be daunting. However, we encourage concerns to be reported internally as soon as possible where wrongdoing is suspected. We are here to listen and will take all concerns that you raise seriously.

This policy explains more about the nature of whistleblowing concerns and sets out the procedure for making a disclosure, in addition to the support and protection that is available when a concern is raised.

If the concern relates to a personal grievance that is not in the public interest (for example, an allegation of bullying or harassment, or an allegation that your contract of employment has been breached), you should raise it under the Cathedral's **Anti-Bullying and Harassment Policy** or **Grievance Procedure** as appropriate.

If you are unsure about whether your concerns are best dealt with under the whistleblowing policy or a different policy, please speak to a member of the Human Resources team for further advice.

## Policy Statement

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 Cathedral employee's, casual workers, clergy, licensed ministers and other individuals 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 Cathedral employee's, casual workers, clergy, licensed ministers and other individuals to be watchful for such conduct and to report anything that they reasonably believe has been, is being or is likely to be committed and is in the public interest, by 'whistleblowing' in line with this policy, so that it can be properly dealt with.

### 1. Purpose

This purpose of this policy is to:

- (a) to encourage suspected wrongdoing to be reported as soon as possible, in the knowledge that concerns will be taken seriously and investigated as appropriate, and that confidentiality will be respected;
- (b) to provide guidance as to how to raise concerns; and
- (c) to reassure that genuine concerns should be able to be raised without fear of reprisals, even if they turn out to be a mistake.

However, this policy should not be used for complaints relating to an individual's own personal circumstances and are not in the public interest, such as the way they are being treated at work - in these cases, they should use the Cathedral's **Grievance Procedure** or **Anti-Bullying and Harassment Policy** as appropriate.

### 2. Scope

The policy applies to all Cathedral employees, casual workers, clergy and licensed ministers. Other individuals, including volunteers, agency workers, contractors, subcontractors and suppliers are also encouraged to follow the procedure set out in this policy.

### 3. Whistleblowing concerns

Whistleblowing is the act of reporting suspected wrongdoing or risk of wrongdoing, not limited to, but may include the following below:

- criminal activity;
- a safeguarding concern;
- failure to comply with any legal obligation;
- financial fraud or mismanagement;
- breach of internal policies and procedures;

- negligence;
- damage to the environment;
- conduct likely to damage the Cathedral's reputation or financial wellbeing;
- unauthorised disclosure of confidential information;
- the deliberate concealment of any of the above matters.

It is not necessary for the 'whistleblower' to prove the wrongdoing. However, they must reasonably believe that wrongdoing is being, has been, or is likely to be committed and that their disclosure is in the public interest.

#### **4. Who is a whistleblower?**

A 'whistleblower' is a person who raises a genuine concern relating to any of the above.

We recognise that raising a whistleblowing concern can be daunting. However, we encourage you to report concerns internally as soon as possible where you suspect wrongdoing. The Cathedral is here to listen and will take all concerns that you raise seriously.

#### **5. Raising a whistleblowing concern**

If you have a genuine concern relating to any type of wrongdoing that is covered under this policy, you can raise your concern orally, or in writing. When raising your concern, it is important that you set out clearly:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- what action (if any) you are seeking.

In the first instance, you should report your concern to the Chief Operating Officer (COO). However, it is expressly required, in matters concerning the safety of those on our premises (whether staff, volunteers, contractors, suppliers or visitors), that if you become aware of a hazard or dangerous occurrence, that you notify the Director of Property and the COO before making any other report, not least so that immediate action can be taken if necessary to remove the hazard. If the COO is absent, whistleblowing concerns should go to the Chief Financial Officer (CFO).

You may also speak to the Safeguarding Officer, 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. If the Safeguarding Officer is absent, concerns should go to the Canon Steward.

Contact details for the above individuals are set out in 'Contact details' below.

However, if your concern is about the COO, speak to the Head of Human Resources who will inform the Dean. If your concern is about the Dean or a Residentiary Canon, speak to the Head of Human Resources who will inform the Bishop of London. In the absence of the Head of Human Resources, please speak to the Senior Non-Executive Member of Chapter.

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 COO or one of the others listed in 'Contact details' below.

## **6. Investigation and Outcome**

Once you have raised a concern, we will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. We will take down a written summary of your concern and provide you with a copy after the meeting.

We will then carry out an initial assessment to determine the scope of any investigation, which will be carried out promptly.

Please note that you may be required to attend additional meetings to provide further information. These will be arranged as soon as possible.

In some cases, an investigator or team of investigators may be appointed, 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 level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing. However, 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 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 following an investigation, the disciplinary procedure will commence. If no action is to be taken, this will be detailed in the report.

While the aim will be to provide you with comprehensive written feedback of the outcome and any next steps or action to be taken, in some cases this may not be possible, for example where data protection rules apply or there are sensitive issues that need to remain confidential. 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 appeal to a more senior individual than the individual who handled the original concern, orally or in writing. When appealing, it is important, that you set out clearly the grounds of your appeal, i.e. the basis on which you consider that your original concern has not been satisfactorily dealt with.

The individual will then consider your grounds for appeal and review how your original whistleblowing concern was handled. They may arrange for a second investigation to be carried out. You will be informed in writing of the outcome as quickly as possible.

## 7. Confidentiality

We hope that you will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage individuals to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

## 8. Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions, however, they have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined, dismissed or threatened) because they have raised a whistleblowing concern.

If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with adequate support and protection.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to the COO or the Head of Human Resources. Alternatively, you can raise it under the Cathedral's **Grievance Procedure**.

Any such behaviour will not be tolerated and will be treated as a disciplinary offence.

Alternatively, if we find that an individual has knowingly made a disclosure in bad faith (for instance, in order to cause disruption within the Cathedral) 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.

## 9. Raising your whistleblowing concerns externally

In most cases, we hope you should not find it necessary to raise your concerns with anyone externally, however, if you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.

Protect (*formerly Public Concern at Work*), the independent whistleblowing charity, operates a confidential helpline and can provide advice for raising a concern both internally and externally. For their details, refer to 'Contact details' below.

## 10. Contact details

<b>Chief Operating Officer (COO)</b>	Emily MacKenzie
	020 7246 8345 (or extension 1345)
	<a href="mailto:emackenzie@stpaulscathedral.org.uk">emackenzie@stpaulscathedral.org.uk</a>
<b>Chief Financial Officer (CFO)</b>	Nick Sharman
	020 7246 8310 (or extension 1310)
	<a href="mailto:nsharman@stpaulscathedral.org.uk">nsharman@stpaulscathedral.org.uk</a>
<b>Director of Property</b>	Rebecca Thompson
	020 7329 5572 (or extension 1572)
	<a href="mailto:rthompson@stpaulscathedral.org.uk">rthompson@stpaulscathedral.org.uk</a>
<b>Works Office Manager</b>	Laura Hughes
	020 7246 8306 (or extension 1306)
	<a href="mailto:worksoffice@stpaulscathedral.org.uk">worksoffice@stpaulscathedral.org.uk</a>
<b>Safeguarding Officer</b>	Louise Wilcox
	07708 255144
	<a href="mailto:lwilcox@stpaulscathedral.org.uk">lwilcox@stpaulscathedral.org.uk</a>
<b>Head of Human Resources</b>	Melanie Barker
	020 7246 8303 (or extension 1303)
	<a href="mailto:mbarker@stpaulscathedral.org.uk">mbarker@stpaulscathedral.org.uk</a>
<b>Senior Non-Executive Member of Chapter</b>	Sheila Nicoll
	<a href="mailto:sheila@sheilanicoll.co.uk">sheila@sheilanicoll.co.uk</a>
<b>GOV.UK website re: whistleblowing</b>	<a href="https://www.gov.uk/whistleblowing">https://www.gov.uk/whistleblowing</a>
<b>Protect (free, confidential whistleblowing advice)</b>	020 3117 2520
	<a href="https://protect-advice.org.uk">https://protect-advice.org.uk</a>

## **11. Responsibilities**

The Chapter is responsible for approving this policy and has overall responsibility for its effective operation. The Chapter have delegated overall responsibility for overseeing its implementation to the Head of Human Resources. Heads of Department and line managers are responsible for ensuring Cathedral employee's, casual workers, clergy and licensed ministers and other individuals are aware of this policy and referring these individuals to Human Resources in relation to this policy when required.

## **12. Questions**

Any questions about this policy or its application should be referred to the Human Resources department in the first instance.

## **13. Review**

This policy was approved by the Chapter on 20<sup>th</sup> March 2024. Suggestions for changes to the policy should be reported to the Head of Human Resources, who proposes the detail of the policy, on behalf of Chapter, be reviewed no later than between one and three years from the adoption date, depending on the circumstances.

## **14. Associated Policies**

- Anti-Bullying and Harassment Policy
- Disciplinary Procedure
- Grievance Procedure

*This policy does not form part of any contract of employment, and it may be amended at any time, subject to Chapter approval.*

## Appendix I - Whistleblowing Flowchart





