

Congo Church Association ("CCA")
Whistleblowing policy
Applies to all Trustees and any other concerned party

Approved by the Board on	Due for review on

1. Confidentiality

The identity of the person reporting the concerns will be kept confidential as far as is possible. However, there may be situations where it is not possible to retain complete confidentiality (e.g. where the police are involved, where the person needs to make a statement or attend an investigative hearing as a witness).

Where it is not possible to investigate the concern without identifying the person, the Chair (or if the person concerned is the Chair, the Hon Secretary) will discuss with the person how best to proceed with the investigation.

2. Protection for the person 'Blowing the Whistle'

The person who reports the concern of malpractice or wrongdoing will be treated fairly. There should be no fear of punishment or unfair treatment from CCA Trustees. However, the person who 'Blows the whistle' must make sure that the information provided is correct and true – acting in 'good faith' - and is an honest explanation of the concern.

If the person reports the concern in 'good faith', but following an investigation the report cannot be confirmed, then no action will be taken against the person. In making a report the person should be careful to ensure that the information is correct and true. If, however, a person deliberately makes a false report, then disciplinary action may be taken against that person, if appropriate.

3. What types of concerns are covered by this policy

The concern raised should relate to a specific malpractice or wrongdoing by a CCA Trustee, consultant, contractor, volunteer or person who has a direct control over the possible solution. The list below shows the types of malpractice or wrongdoing that should be reported, however this is not an exhaustive list.

- a person has, will or is likely to commit a **fraud/theft or bribery**
- a person has, will or is likely to **abuse or exploit** another person - child / vulnerable adult / beneficiary e.g. sexual or physical abuse
- a person has, will or is likely to engage in or facilitate the **human trafficking** of another person
- a person has, will or is likely to participate in a **criminal or illegal activity**
- the organisation or a person within the organisation has, will or is likely to engage in **unacceptable fundraising practices**
- a person has, will or is likely to **endanger the health and safety** of another person

or the environment.

- a person has, will or is likely to **corrupt/abuse an organisational practice/procedure**
- a person has, will or is likely to do **something illegal** e.g. breach of contract, negligence, damage/misuse company property.
- a person has, will or is likely to **behave in a way that is not in line** with the Code of Conduct in the Safeguarding policy
- a person has, will or is likely to **victimise another person** e.g. a person uses their position or authority to abuse/victimise another person.
- There are reasonable grounds for believing that a person might do any of those things.

4. How to report your concerns

All concerns should be reported directly to whistleblowing@congochurchassn.org.uk at the earliest opportunity. Trustees will nominate a "whistleblowing" officer who shall have sole access to that email address and who is tasked with monitoring it at least weekly. The whistleblowing officer shall:

- log an incident report of the matter reported using a template set up by him/her and approved by the Trustees;
- bring the matter to the next Trustee meeting or, if severe, convene an emergency Trustee meeting.

The log will be reviewed annually at the first Trustee meeting of the calendar year and changes made to the risk register if appropriate.

When reporting, the person should clearly state the facts and details of the concern. If the report involves a child / vulnerable adult / beneficiary, do not disclose their specific names or details.

While the report can be sent anonymously, anonymous reports are very difficult to investigate. Therefore CCA encourages the person making the report to provide a contact name and telephone number/email address.

5. Feedback

Wherever possible, feedback should be given to the person who reported the concern.

If the report is of a confidential/private nature or is sensitive, then it may not be possible to provide feedback.

6. Pastoral Support

If the person making the report feels anxiety, stress or fear as a result of 'Blowing the Whistle', then the person should be given some pastoral support.