



# Whistleblowing Policy

## Section A: Policy details

### 1. What does this policy cover, and who is covered?

All employees, contractors, consultants, officers, interns, and volunteers are covered by this policy.

It sets out what they should do if they have reason to believe that something dangerous, unlawful or unethical is going on at work and it is affecting (or risks affecting) them or other colleagues.

This policy also covers the actions of third parties such as suppliers, service providers, and clients, as well as our staff. If you are concerned about a third party, please also raise them with us before approaching anyone else

There will be no reprisals for individuals who bring these concerns to our attention – we value and respect all such reports and those who make them to us.

### 2. What sorts of activities are typically considered relevant to whistleblowing?

This is not an exhaustive list, but the types of concerns you may want to raise with us by whistleblowing could include:

- Any activity you suspect is criminal
- Any activity you suspect puts health and safety at risk
- Any activity you suspect may damage the environment
- Any activity you suspect breaches our policy on bribery and corruption
- Any failure to comply with legal or regulatory obligations
- Any failure to meet professional requirements
- Any attempt to conceal one or more of these activities

Please speak to a member of the National Leadership Team if you are unsure whether something that you are concerned about is covered by this policy.

If your complaint is about the behaviour of others towards you, our Grievance Procedure contains the relevant guidance on how to proceed. These types of behaviour are not covered by this whistleblowing policy.

## **Section B: Our procedure for raising a whistleblowing concern**

Please follow this procedure:

- Raise your concerns with a member of the National Leadership Team in the first instance. You may do so in writing or in person.
- If you would prefer not to discuss your concerns with a member of the National Leadership Team, or you consider that your concerns are extremely serious, you should write to the Chairperson of the board of directors.
- Please explain that you are raising your concerns as part of the Christian Churches Ireland's whistleblowing policy and procedure. Then set out all the key facts, including names of those involved and all relevant dates.
- You will be invited to a meeting at which you can discuss your concerns. You are entitled to bring someone with you to this meeting – and any subsequent meetings. Anyone who accompanies you will be asked to agree to keep strictly confidential the contents of the meeting including any materials disclosed and/or examined during it. This obligation of confidentiality will extend before, during and after the meeting and any following investigation that we conduct in relation to the concerns raised by you.
- Following this meeting, we will investigate the matters raised and we may request that you come to additional meetings to assist us in our efforts. We may also decide to involve relevant external (or internal) specialists to help us conduct a thorough, fair and responsible investigation.
- Our relevant personnel involved in this investigation will keep you informed about the progress of the investigation as far as they are able. For a number of reasons, generally relating to legal obligations, including obligations of confidence, to others, or in relation to any legal advice that we may decide to take on our own behalf, we may not be able to share every detail of our discoveries or deliberations with you. We will always endeavour, however, to reassure you, as best as we can, of the fact that we are taking your concerns seriously and that we are conducting a responsible investigation.
- It is possible that the outcome of our investigations will not be one that you find satisfactory. If this happens, you are entitled to complain to the Chairperson of the board of directors and request a review of what has been done and concluded.

If you have raised a concern in good faith, our process and all those involved in giving effect to it will support and protect you. However, if a false concern is raised with us in bad faith (e.g. for malicious reasons), we will invoke our disciplinary policy and you may be subject to disciplinary action.

*Adopted by the AGI board on 07 October 2020*