



Control Document

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WHISTLEBLOWING CODE OF PRACTICE

POLICY STATEMENT

1. The Public Interest Disclosure Act 1998 provides employees with legal protection against being dismissed or penalised by their employers as a result of disclosing certain serious concerns. It also requires employees who wish to disclose such concerns and who wish to retain the protection offered by the Act to follow the relevant internal procedure provided by their employer in all but the most exceptional circumstances.
2. Christ Church takes these responsibilities seriously and places great importance on the integrity of its operations.

PURPOSE AND SCOPE

3. The following procedure and associated guidance have been designed to assist employees who wish to make such disclosures, and to secure the proper investigation of issues.
4. Although the terms of the Act offer protection specifically to employees, workers, office holders, interns and contractors, this procedure is available to student members and senior members of Christ Church who are not employees. This policy also applies to volunteers in the Cathedral.

PRINCIPLES

5. Christ Church has in place a number of policies and procedures to address problems that may arise for its employees and students, including those relating to grievance, harassment, discipline, and individual allegations of fraud. In many instances where there is a suspicion of improper behaviour, allegations will be such as to be dealt with directly by reference to these procedures.
6. Christ Church places the greatest importance on the integrity of its operations and encourages members of staff, volunteers, senior members and student members to raise genuine concerns about malpractice or impropriety at the earliest possible stage. There may be occasions when an individual has concerns relating to matters in the public interest which they



believe merit particular investigation. The following procedure sets out the way in which Christ Church will address such concerns.

7. Safeguarding concerns must be reported in line with the Christ Church Cathedral Safeguarding Policy or the Christ Church Policy procedure outlined below.

OUTCOMES

8. The outcomes to be achieved from the successful application of this Code of Practice are:
 - There is a transparent and confidential process for dealing with concerns;
 - All members, employees and volunteers of Christ Church feel able to disclose concerns without fear of retribution.

MONITORING AND REVIEW

9. A formal review of this Code of Practice and procedure will take place every three years, or sooner if there is an organisational need or changes in the law.
10. This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of Christ Church.



WHISTLEBLOWING PROCEDURE

Introduction

1. This policy is directed specifically at the disclosure of information which is in the public interest and which in the reasonable belief of the person making the disclosure tends to show malpractice involving one or more of the following, known as qualifying disclosures:
 - a. criminal activity, including fraud or financial irregularity, corruption, bribery, or blackmail;
 - b. failure to comply with legal obligations;
 - c. danger to health and safety;
 - d. risk or actual damage to the environment;
 - e. academic or professional malpractice;
 - f. a miscarriage of justice;
 - g. failure to comply with the statutes, codes of practice and policies and procedures of Christ Church;
 - h. from 6 April 2026, reporting sexual harassment is recognised as a qualifying disclosure;
 - i. attempts to conceal any of the above.
2. Individuals are encouraged to bring to the attention of Christ Church any matters referred to above about which they are concerned.
3. This procedure is **not** designed to address the following:
 - a. financial or business decisions taken by Christ Church;
 - b. the reconsideration of any matters which have already been addressed under grievance or disciplinary procedures unless the particular case is in the public interest;
 - c. the investigation of an individual or collective personnel dispute for which there are established routes of complaint and remedies;
 - d. the investigation of an academic dispute between a student and Christ Church (complaints of this nature should be addressed to the Senior Censor for consideration under the relevant procedure(s)).
 - e. Safeguarding concerns
4. Once a disclosure is being dealt with under this procedure, it is reasonable to expect individuals to await the conclusion of any investigation or review instigated under its terms before seeking to air their complaints outside of Christ Church.



Procedure

5. An individual who wishes to make a disclosure which concerns an employee or employees, students or senior members of Christ Church, or any combination of members of Christ Church should do so as soon as possible to the Chair of Audit and Risk (richard.a.rawlinson@gmail.com). The Chair of Audit and Risk, supported by the Director of Human Resources, will maintain an oversight of all Whistleblowing investigations and of their outcomes. Should the matter concern Cathedral employees and volunteers, the disclosure should be made to the Cathedral Registrar as the designated whistleblowing officer for the cathedral (john.briggs@chch.ox.ac.uk)
6. Disclosures should usually be in writing and should provide as much supporting evidence as possible about the basis on which the disclosure is being made and about the grounds for believing that malpractice has occurred.
7. The Chair of Audit and Risk Committee/Cathedral Registrar shall decide whether the concern should be addressed under another existing Christ Church policy or procedure, for example in relation to harassment, grievance, discipline, or fraud, or whether further investigation is required.
8. If the Chair of Audit and Risk Committee/Cathedral Registrar is of the opinion that further investigation is necessary, the following additional steps should be taken:
 - a. Where the concerns relate to integrity in the conduct of research, investigation shall be carried out under the provisions of the University Code of Practice and Procedure relating to academic integrity in research;
 - b. Where the concern relates to the activities of Junior Members of Christ Church, these shall be investigated by the Senior Censor;
 - c. In the case of other concerns, these shall be brought to the attention of the relevant College Officer, who shall be deemed the investigating officer and shall, in consultation with the Dean, investigate or establish a small panel to conduct an investigation;
 - d. The individual or panel conducting the investigation shall be entitled to draw on appropriate expertise where necessary (for example in accounting or legal matters);
 - e. If any individual is associated with the matter under investigation, an alternative investigating officer will be appointed to act in their place.
9. The investigating officer shall inform the person making the disclosure and at an appropriate stage shall inform them of the nature of the investigation to be undertaken and the likely timescale. Where a disclosure is made, the



person or persons against whom the disclosure is made shall normally be allowed to comment before any investigation is concluded under this procedure.

10. Where the investigating officer or the panel (appointed under 8 d) believes that the investigation reveals prima facie evidence of misconduct, the matter shall be referred to the appropriate body for disciplinary action under the terms of Christ Church's Statutes and Bylaws.

Confidentiality

11. Christ Church will treat all disclosures in a confidential manner as far as it is able to do so.
12. Action will not normally be taken in response to anonymous complaints.

Protection

13. An individual making a disclosure will not be penalised provided the disclosure is made
 - a. in good faith; and
 - b. in the reasonable belief that the information disclosed, and any allegation contained in it, are substantially true.
14. However, in the event of malicious or vexatious allegations, disciplinary action may be taken against the individual concerned.

Feedback

15. The action taken including the outcome of any investigation, shall be reported, in broad outline, to the person making the disclosure. In the event that no action is taken that person shall be given an explanation.
16. In the event that no action is taken, or the person making the disclosure is not satisfied with the explanation, the individual should be allowed the opportunity to remake the disclosure to the Dean*. The Dean shall consider all the information presented, ensure that the procedure was followed, and consider the reason(s) for not taking any further action. The outcome of this will either be to confirm that no further action is required or that further investigation is required, in which case the procedure above, as appropriate, shall be followed.
17. Protect, the Whistleblowing Charity, can be contacted on 020 3117 2520 for further confidential advice.



* If the matter relates specifically to the Dean the matter should be raised with the Senior Censor or Censor Theologiae. If the matter concerns the Cathedral Registrar, the issue should be raised with the Sub Dean.