ARCHDIOCESE OF SOUTHWARK
VOLUNTEER WHISTLEBLOWING POLICY

1. INTRODUCTION

1.1 The Southwark Archdiocese is a registered charity (Charity No.1173050.) We promote the highest standards of transparency and accountability, encouraging an open culture in in all aspects of our Mission.

1.2 The Archdiocese recognises its responsibility to deal fairly, constructively and consistently with any concern or dissatisfaction raised and holds the discretion to decide under which policy a concern will be considered.

1.3 This Whistleblowing policy is for all Volunteers, who give their time freely for the Archdiocese, who have a serious concern in regards to a breach of our standards or conduct. The Archdiocese expects all to conduct themselves ethically, with honesty and integrity;

- the highest possible standards of openness, probity and accountability;
- good practice and high standards regardless of their role; and
- being supportive of each other.

1.4 This policy aims to guide any volunteer who has a serious concern (within the categories below), that they reasonably believe is in the public interest to raise, know how to raise it and that the matter will be comprehensively investigated and appropriate action taken. The individual will be protected by this policy, with confidence and without having to worry about being victimised, discriminated against or disadvantaged in any way as a result of raising any serious concern.

2. POLICY SCOPE

2.1 This policy applies to any serious concern, that the Employment Rights Act 1996, refers to as a "**protected disclosure**". While a volunteer is not an employee, the Archdiocese of Southwark aims to offer them the same rights held within this legislation.

A protected disclosure is where;

- An individual makes a disclosure of information;
- An individual reasonably believes the concern they have raised shows information within one of the relevant categories below; and
- An individual reasonably believes that the concern raised is in the public interest (affecting the general public or a group of people).

2.2 The six relevant categories are:

1. Commission of a Criminal Offence;
2. Health and Safety risks;
3. Damage to the environment (or its concealment);
4. miscarriage of justice;
5. a failure to comply with any legal or regulatory obligation;
6. that information tending to show any matter failing within any of the above categories, is being or is likely to be deliberately concealed.

This may include;

a) a safeguarding issue;
b) fraud or corruption;
c) unauthorised use/misuse of finances or other resources.
d) a serious breach of the Archdiocese policies

This policy does not replace other policies or procedures. If an individual has a concern or complaint which is not a protected disclosure, this concern should still be raised through the correct policy. Conduct which is reasonably likely to seriously harm the reputation of the Archdiocese and/or The Catholic Church, which does not appear above, may also be covered by this policy.

2.4 This policy is written in the context of the Public Interest Disclosure Act 1998 which protects individuals who 'blow the whistle' on malpractices within their organisation.

2.5 Any concern about the safety or wellbeing of a child or vulnerable adult, must in the first instance follow the Safeguarding Policy and the matter must be reported to the Safeguarding Team. Crimes against a person or property should be reported immediately to the police

3. APPLICATION

3.1 An individual who wishes to raise a concern that fits the criteria of a **protected disclosure** should follow this Whistleblowing policy. This includes if the incident is happening now, took place in the past or may happen in the future. It is important that the concern is raised without delay.

3.2 A report under the Whistleblowing Policy will be treated with high importance. On receipt of a whistleblowing report, procedures set out within this policy will be put into effect immediately.

3.3 This policy should not be used when the issue relates to an employment issue. These issues should be dealt with through the Archdiocese's Procedures set out in the Staff Handbook.

3.4 Any whistleblowing report will be investigated fully, the concerns addressed as a priority and initial steps within the timescale detailed below. Any Clergy, Religious, staff or volunteer contacted by an investigator in relation to a whistleblowing investigation should support that investigation by being open and timely in the information provided.

4. HOW TO REPORT

4.1 The report can be in writing or reported verbally. Young people are encouraged to speak to a parent, carer or trusted adult if they wish to report a matter through the Whistleblowing Policy so that they can be supported throughout the process.

4.2 The designated person nominated to handle whistleblowing concerns within the Archdiocese is the Head of Safeguarding, contact details are:

Email: whistleblowing@rcaos.org.uk
By post: 59 Westminster Bridge Road, London SE1 7JE, marked **"Whistleblowing"**

4.3 If the issue relates to the Head of Safeguarding it should, in the first instance be raised with the Chief Operating Officer:

Email: secretary@rcaos.org.uk

5. ACTION

5.1 Details required;

- A report can be made anonymously, but the Archdiocese encourage the sharing of information where possible.
- a contact telephone number and/or email address so that contact can be maintained, unless anonymity is desired
- Why you consider the referral to be a "protected disclosure" under the whistleblowing policy
- The background and history of the concern

5.2 Any individual who reports a concern must respond within an agreed timeframe, in order to support the process and will be kept updated throughout the process, where appropriate.

5.4 If any individual is unsure whether to use this procedure or they want independent advice at any stage, they can contact **Protect**, an independent charity that specialise in supporting individuals with potential [whistle-blowing] concerns. Protect can be contact either via their website or on 020 3117 2520.

5.5 Action on receipt of a concern (usually within 5 working days)

- Where an individual makes a whistleblowing concern they must notify the Designated Person using the details above.
- Where a line manager receives a whistleblowing concern they must notify the Designated Person using the details above.
- When a report is received by the Designated Person, they will consider the report and acknowledge receipt. They may also contact the complainant (whistle-blower) for clarification.
- The report will be logged on a confidential register held centrally.
- Available information will be collected, including any documentation or statement supplied by the complainant (whistle-blower).
- An impartial investigator will be appointed by the Designated Person.

5.6 Usually within 10 working days**,** the complainant (the whistle-blower) will be provided with the following information:

- Confirmation as to whether the matter will be investigated under The Archdiocese Whistleblowing policy.
- If the matter will not be proceeding through this process, an update regarding what action, if any is being taken and the reasons why
- The name of the investigator
- Details of the nominated person for contact.
- What action has been taken
- An indication of the anticipated timeframe to conclude the matter
- Information about support and protection for the complainant (whistle-blower)

5.7 If an individual knowingly or maliciously makes an untrue allegation the Archdiocese will take appropriate action in regards to this.

6. INVESTIGATION

6.1 An impartial investigator will be appointed. This may be a member of Clergy/Religious, a volunteer, a staff member or someone external to The Archdiocese as appropriate. The investigator will complete any enquiries required and review all relevant documentation. If an individual is required to attend a meeting in regards to any investigation, they may request that an appropriate person attends with them to offer support.

6.2 The Archdiocese may decide to refer the investigation to a relevant external body or authority. They may also halt any investigation or hand over the enquiry to another body or authority. The complainant will be informed of this decision.

A relevant external body or authority may include: (This is not an exhaustive list)

- the police
- the Charity Commission
- the Health and Safety Exchange (HSE)

6.3 All information in relation to any investigation will be treated as confidential. A report will be compiled by the investigator and will only be shared with the Designated Person. Depending upon the outcome of any investigation a decision will be made as to the appropriate action and learning.

7. SUPPORT FOR THE COMPLAINANT (WHISTLE-BLOWER)

7.1 Any induvial raising a concern through this policy will be supported throughout any investigation. If an individual experiences victimisation, discrimination or any unfavourable treatment due to their complaint they must report this immediately.

7.2 If anyone should attempt to stop, discourage or in any way victimise a person reporting a concern that they reasonably believe to be in the public interest, they would themselves be subject to the relevant procedures.

7.3 The Archdiocese would rather be informed anonymously than not at all. However, in order for a thorough investigation and be able to substantiate any claims, it is always preferable for the complainant to supply their details.

7.4 Where a potential complainant wishes to remain anonymous, it will be considered at the discretion of the Designated Person, with reference to the criteria within the Charity Commission or other relevant regulatory guidance. In exercising this discretion, the following will be considered:

- The seriousness of the issue raised
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

7.5 In order to maintain confidentiality and in keeping with legal obligations, it may not always be possible to let the complainant (whistle-blower) know the outcome of any investigation, but they will be informed when the investigation has been completed.

7.6 The Archdiocese will use the whistleblowing register to monitor progress and keep track of any investigation and any actions that need to be taken. The Designated Person will manage the progress and provide accountability.

The Register must be kept updated stating:

- The name and status of the whistle-blower

- The date on which The Archdiocese received the whistle-blower's report of an incident
- The nature of the whistle-blowing incident
- Details of the person who received the whistle-blowing report
- Whether it is to be investigated and by whom
- The outcome of the investigation
- Learning identified from the incident
- What action or change has been implemented as a result of the incident
- Any recommendations to be considered and by when

7.7 The Register will be confidential and only an anonymised version will be made available for inspection by the Board of Trustees. The Designated Person will report annually to the Board of Trustees on the operation of the Whistleblowing policy and any allegations made.

8. CONFIDENTIALITY

8.1 All Whistleblowing matters will be treated in confidence and the identity of the complainant (whistle-blower) will only be known by the Designated Person and the nominated investigator.

8.2 The Archdiocese will only identify the complainant;

- Where there is a duty to refer to statutory agencies.
- Where the matter results in court proceedings and the complainant is required to give evidence
- Where it is required in order to progress an investigation
- If the matter is subsequently handled under a different process (e.g. complaints/safeguarding procedure)

Every effort will be taken by The Archdiocese to notify the complainant if the above becomes applicable. This is in-line with The Archdiocese GDPR guidance.

9. WHERE CAN THE CONCERN BE RAISED?

9.1 The Archdiocese encourages any individual to report a concern using the Whistleblowing Procedure. In some instances, an individual may wish to inform an external prescribed body or the Charity Commission. However, this is usually only appropriate where an individual believes their concern has not been taken seriously by The Archdiocese and/or the matter raised is continuing.

9.2 The Archdiocese acknowledges that utilising the media (including social-media) may be a route that an individual may consider rather than engage with this process. The Archdiocese strongly advise that an individual seek specialist advice before considering communicating their concerns to the media as doing so may have serious repercussions in certain circumstances.

9.3 If after an investigation, no wrongdoing is found, there will not be any negative consequences for the complainant, provided the individual had a reasonable belief that it was in the public interest to make the disclosure. If the disclosure was made maliciously, for personal gain or there was no element of public interest, there would be no protection under the Whistleblowing policy.

9.4 This policy does not replace other policies or procedures. If an individual has a concern or complaint which is not a protected disclosure, this concern should still be raised through the correct policy.

10. APPEALS

10.1 If at the end of the Whistleblowing process, the complainant (the whistle-blower) is not satisfied with the outcome they may appeal the decision. An individual has grounds for appeal if they believe that the correct process has not be followed or has new information that they wish to be considered, may appeal to the Chief Operating Officer. This must be done within 30 days of the date of the outcome being sent. The appeal must be in writing and forwarded via the Whistleblowing email address above or by post to 59 Westminster Bridge Road, London SE1 7JE; the envelope should be marked **"Whistleblowing".**

11. RELEVANT WEBSITES AND CONTACTS

The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline.
Charity Commission - 0300 065 2199
Government Guidance and links to Charity Commission.
https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer
Protect – 0203 117 2520; E-mail: whistle@pcaw.co.uk; Website: www.pcaw.co.uk
NSPCC whistleblowing advice line for professionals

12. LEGISLATION AND DEFINITIONS

12.1 This Policy is in-line with the Employment Rights Act 1996. The Act gives legal protection to employees. It does not apply to volunteers and members of charitable organisations. However, under this policy the same protection is given to our volunteers, provided the conditions are met for the policy to apply.

13. REVIEW

13.1 This policy is due for review;

- every 12 months or
- following any legislative changes, or;
- following any learning by The Archdiocese, or;
- as required by the Charity Commission, or;
- any change in jurisdictional guidance, whichever comes first.

The policy will be reviewed by the **Safeguarding Commission** and revisions will be recommended to the Board of Trustees.

Whistleblowing Report

PLEASE COMPLETE AS MUCH OF THIS FORM AS POSSIBLE INCLUDING ESSENTIAL INFORMATION.

If you do not have all the information please do send this form and then follow up with additional information as soon as you get it.

A Whistleblowing report applies to any serious concern that the Public Interest Disclosure Act refers to as a "**protected disclosure**". A protected disclosure is where the information given falls into the criteria of;

- A volunteer reasonably believes the concern they have raised
- The concern raised is in the public interest (affecting the general public or a group of people); and
- Identifies one or more of six specified types of wrongdoing listed within the Act.

These are;

1. **a criminal offence, e.g. fraud**
2. **someone's health and safety is in danger**
3. **risk or actual damage to the environment**
4. **a miscarriage of justice**
5. **the organisation is breaking the law**
6. **you believe someone is covering up wrongdoing**

The Archdiocese of Southwark Whistleblowing Policy also includes conduct which is reasonably likely to seriously harm the reputation of Archdiocese, which does not appear above.

All Whistleblowing Reports will be reviewed and responded to by the Head of Safeguarding.

If you wish to discuss your report or for advice or guidance please contact the Whistleblowing Report line on :

whistleblowing@rcaos.org.uk
or Post to 59 Westminster Bridge Road, London SE1 7JE

If you believe that any person is at immediate risk of significant harm call 999 and report to the Police.

Once this report has been completed please email it to **whistleblowing@rcaos.org.uk**
or send to: **Whistleblowing**
59 Westminster Bridge Rd
London
SE1 7JE

YOUR PERSONAL DETAILS

Your name	
Your role in the Archdiocese	
Your telephone number	
Your email	
Your preferred method of communication	
Your home address	
Any other additional information	

Why this is a Whistleblowing report. (How it is a "protected disclosure" or seriously	

harm the reputation of The Archdiocese) See Whistleblowing policy for further guidance	
Full detail of incident/concern/report that you wish to be considered under The Whistleblowing Policy	
How you became aware of incident/concern/report	
Any relevant background in regards to this incident/report/concern?	
Date you became aware of incident/concern/report	

INFORMATION REGARDING ANY OTHER PERSONS INVOLVED

Name	
Their role within the Archdiocese	
Their Parish/Order/Other	
Their occupation, if known	
How are they involved in the concern that is being reported?	
Do they know that this report is being made?	
Any additional information?	

Any additional relevant information regarding the incident/concern/report?

Are you aware of any previous concerns being raised?
ANY OTHER INFORMATION

THANK YOU FOR TAKING THE TIME TO COMPLETE AND RETURN THIS FORM

TO BE COMPLETED BY THE DESIGNATED PERSON ON REVIEW OF REPORT RECEIVED
Does this report fall under the criteria of a Whistleblowing concern?
How does this fall into the criteria of a Whistleblowing report?
Name of Investigator appointed
Has the Referrer been given the details of the nominated investigator? Yes/No

If this does not fall under the Whistleblowing policy, the referrer must be contacted and informed of this decision.
Has this been completed?
Yes/No Date informed

GDPR Note:

We take personal data privacy seriously and we have a duty of care around the information contained within this form. The data shared in this form is to be securely stored (in secure online storage and/or as paper based records in locked cabinets). Where the data is no longer required it should be securely destroyed. For further detail please visit our Data Protection Policy here**.**