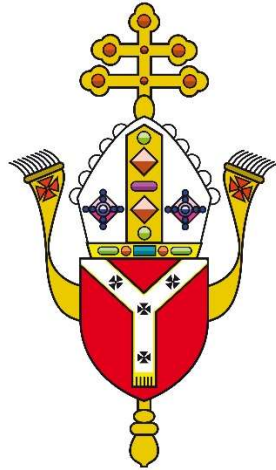


DIOCESE OF WESTMINSTER



WHISTLEBLOWING POLICY

Policy prepared by:	Head of HR / Head of Safeguarding
Third Party Policy:	
Sub-Committee Approval:	HR Committee: 2 July 2025 Safeguarding Committee: 3 July 2025
Approval of The Directors of the Trustee	11 July 2025
Review Date	July 2027

1. Introduction

The **Roman Catholic Diocese of Westminster Trust (RCDow)** upholds a mission centred on:

- Respect for the intrinsic dignity of every person
- Mutual respect in all relationships
- Responsible stewardship of resources, including the environment
- Transparency and accountability in all aspects of its work

RCDOW is committed to maintaining the highest standards of conduct in relation to honesty integrity and ethical responsibility. It recognises the importance of addressing concerns related to wrongdoing, illegality, or risks to the safety and wellbeing of individuals. Employees, volunteers, and clergy are encouraged to report such concerns through this Whistleblowing Procedure.

This includes—but is not limited to—concerns relating to **safeguarding** and the protection of **children, young people, and adults considered to be at risk**

2. Purpose

This policy is intended solely for the purpose of reporting wrongdoing affecting others or the organisation. It is not designed to replace existing internal procedures. Examples include, but are not limited to:

- HR policies i.e. grievances or disciplinarys or;
- Safeguarding policies relating to the management of allegations and concerns relating to children or adults at risk

For further guidance, please contact the Head of HR.

3. Scope

This policy applies equally to:

- Clergy and religious personnel
- Directors
- Trustees
- Employees
- Agency Workers Contractors and Suppliers
- Parishioners
- Volunteers
- Any person or body acting for, or on behalf of the diocese (collectively known within this document as "associated persons").

4. Legal Framework

This procedure aligns with the Public Interest Disclosure Act 1998 (PIDA), which protects individuals ('whistleblowers') in both public and private sectors who raise concerns in the public interest. Under PIDA, all staff have a statutory right to report genuine concerns at any time, with protection from dismissal or victimisation when disclosures are made in good faith

5. Definition

Whistleblowing refers to the disclosure of information to the employer or the relevant authority by an individual ('whistleblower') who knows, or suspects, that the organisation is responsible for or taken part in some wrongdoing.

Certain disclosures are prescribed by law as 'qualifying disclosures'. A 'qualifying disclosure' means a disclosure of information that you genuinely and reasonably believe is in the public interest and shows that the organisation has committed a relevant failure by:

- committing a criminal offence;
- failure to comply with a legal obligation;
- a miscarriage of justice;
- endangering the health and safety of an individual;
- environmental damage;
- a breach of any other legal obligation; *or*
- concealment of any of the above

These acts can be in the past present or future, so that, for example, a disclosure relating to endangering the health and safety of an individual qualifies if it has happened, is happening, or is likely to happen.

6. Whistleblowing Procedure

- 6.1 In the first instance, concerns should be raised with the line manager or parish priest. If this is not possible—or if the individual believes any of these parties may be involved in the wrongdoing—they should proceed directly to Section 6.3

Any concerns relating to safeguarding should be referred in the first instance to the Head of Safeguarding.

Concerns can be made in writing or verbally. A written account is preferable because it makes managing the process more efficient and effective.

The account of concerns should include:

- any relevant background and context;
- dates, times, names and venues; and
- a description of the concern and why the situation caused concern

When raising a concern, it must be stated if the concern is being raised using the whistleblowing policy and if the identity of the person raising the concern is to be kept confidential. Whilst every effort will be made to deal with concerns confidentially, this may not always be possible. If concerns cannot be dealt with anonymously then the person raising the concern must be informed and provided with the reasons why confidentiality is possible.

Anonymous disclosures will be considered but are discouraged because anonymity can make it difficult to investigate, protect those concerned, or provide feedback on outcomes

- 6.2 When a concern is raised through the appropriate channels, the following process will take place:

- The line manager or parish priest will refer the matter to the Head of HR
- HR will arrange an investigation if appropriate
- The employee who raised the concern will be given an opportunity to respond to any new evidence gathered during the investigation.
- The Head of HR will review the findings and present them to the Trustee Board, which will determine any further action, including whether external authorities should be notified.
- If disciplinary action is deemed necessary, HR will initiate the appropriate process.
- The employee or associated person will be informed of the outcome and any actions taken—or, where applicable, the reason no action is being pursued.

6.3 If the employee believes their line manager is involved in the wrongdoing, they should contact the Chair of the Quality Enhancement and Assurance Sub Committee at Whistleblowing@rcdow.org.uk The Chair will arrange an independent review and report the findings to the Trustee Board, and liaise with the Head of HR where appropriate.

6.4 Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The whistleblower will be informed of the outcome of any investigation if applicable as soon as it is reasonably practical to do so.

The action taken by the Diocese will depend upon the nature of the concerns. The matters raised may be subject to, but not limited to:

- Internal investigation;
- Consideration under a Disciplinary or Grievance Procedure;
- Referral to the statutory authorities (Police or Social Care Services);
- Referral to the Catholic Safeguarding Standards Agency (CSSA)
- Consideration under Canon Law;
- Notification to insurers
- Notification to the Charity Commission.

6.5 If on conclusion of the investigation, the whistleblower reasonably believes that the appropriate action has not been taken, they should report the matter to the relevant external authority.

Under whistleblowing legislation, certain bodies are designated to receive such qualifying disclosures. These include, but are not limited to:

- HM Revenue & Customs (HMRC)
- The Financial Conduct Authority (FCA)
- The Competition and Markets Authority (CMA)
- The Health and Safety Executive (HSE)
- The Environment Agency
- The Independent Office for Police Conduct (IOPC)
- The Serious Fraud Office (SFO)

Disclosures to these authorities should be made in good faith and in line with the requirements set out in the **Public Interest Disclosure Act 1998 (PIDA)** For further information, please visit <https://www.legislation.gov.uk/ukpga/1998/23/contents>