

## **The Diocese of Oxford**

### **Whistleblowing Policy and Procedure**

The Diocese of Oxford is committed to the highest possible standards of integrity and recognises that clergy, lay staff and volunteers are often the first to become aware of or identify serious disclosures of public interest. Therefore, in accordance with the Public Interest Disclosure Act 1998 (the 'Act'), the Diocese of Oxford welcomes everyone who has a serious disclosure about any aspect of the Diocese's work to come forward and voice those concerns in confidence without fear of reprisals.

Through this policy we will ensure that the diocesan internal process is available to encourage and enable everyone to make a disclosure in cases when the concern would not meet the criteria for a complaint.

#### **What is Whistleblowing?**

Whistleblowing is the name given to the act of the disclosure of information to the diocese or the relevant authority by an individual who knows, or suspects, that another individual or a group of individuals within the Diocese 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 the person **genuinely and reasonably believes is in the public interest** and shows that the diocese has committed a 'relevant failure' in any of the areas mentioned above.

This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. In other words, it includes the cases when:

- the law may have been broken
- diocesan policies and procedures may have been breached
- there are disclosures of a safeguarding nature

#### **Principles**

This policy is based on the following fundamental principles:

- Everyone has the right to raise disclosures about perceived unacceptable practice or behaviour that is not within the public interest.
- The disclosures can be made about acts that have taken place in the past, present or future, e.g., if it relates to the environmental damage that has happened, is happening or is likely to happen.
- The person making the disclosure must reasonably believe that the disclosure is 'in the public interest'.
- We commit to protecting everyone who raises a disclosure in good faith against potential victimisation or harassment.

- We will endeavour to protect the identity of any individual who raises a whistleblowing disclosure and wishes to remain anonymous. However, in certain circumstances, such as any inquiry arising from the disclosure, the individual may be required to provide a signed statement. In certain circumstances the Diocese may have to disclose the identity of the individual without their consent, for example where there is risk to others involved or this is a safeguarding disclosure. The reasons for this will be discussed with the individual.
- Everyone who raises disclosures will be given appropriate advice and support and kept informed in relation to the progress and outcome of any inquiries.
- Any malicious or vexatious allegations may lead to a disciplinary process for the individual concerned.

### How to raise a disclosure - procedure

It is recognised that there are difficulties in raising a disclosure about the behaviour of a colleague. However, raising the disclosure at an early stage may protect others, prevent the problem getting worse, and prevent individuals themselves becoming implicated. All disclosures reported will be treated in the utmost confidence. The table below describes who might be involved dependent upon the nature of the disclosures:

Individual to whom the disclosures relate to	Individual to report the disclosures to
Clergy	Incumbent
Incumbents	Area Dean
Area Deans	Archdeacons
Archdeacons	Area Bishop
Area Bishops	Bishop of Oxford
Volunteers	Supervising Minister

Clergy staff, lay staff and volunteers can call, write to or arrange to meet with either of the above. You may be asked to confirm any verbal disclosures in writing or to confirm a written record of a verbal report. In the case of a meeting the individual raising the disclosure may wish to invite a supporter.

When reporting a disclosure, you should:

- identify that it is a whistleblowing disclosure;
- detail the background and history of the disclosures;
- give names, dates and places (where possible); and
- note the reasons why the individual is particularly concerned about the situation.

Following receipt of a disclosure made under this policy and dependent upon its nature, the matter may be:

- investigated internally;
- referred to the Police and / or other statutory agencies;

- independently investigated;
- referred for consideration under the Clergy Discipline Measure; or
- a combination of the above.

When the matter is investigated internally the investigation will aim to gather all relevant information including relevant documentary evidence or witness statements. The timeframe of the investigation will be dependent upon the nature of the disclosure.

Once the investigation is complete, you will be informed of the outcome in writing.

As already indicated above, if you do not wish to make the disclosure internally or are not satisfied with the outcome of the internal investigation, you should report it direct to the appropriate organisation or regulatory body with authority for that area.

### **Special Note: Safeguarding**

The Diocese of Oxford is committed to safeguarding the welfare and protection of children and adults at risk of harm. Disclosures about the welfare of children and adults at risk of harm should be raised without delay to prevent any ongoing risk of harm.

Anybody with a safeguarding disclosure should report it to the Diocesan Safeguarding team by completing and returning the [Safeguarding Referral Form](#). Your Parish Safeguarding Officer is also a local first point of contact for reporting safeguarding disclosures.

For further information on all safeguarding procedures within the diocese, please visit our dedicated [safeguarding pages on the diocesan website](#).

To make a general complaint about the way we responded to your safeguarding concerns or handled the case, please refer to our [Safeguarding Complaints policy and procedure](#).

For your information, please note the contact details for the Head of Safeguarding: Louise Whitehead, Head of Safeguarding; Tel: 01865 208215 or Mob: 07391 868478 or [louise.whitehead@oxford.anglican.org](mailto:louise.whitehead@oxford.anglican.org).

If you wish to report any safeguarding disclosures directly to the National Safeguarding Team at Church House Westminster, please email [safeguarding@churchofengland.org](mailto:safeguarding@churchofengland.org).

If, however, you have a concern but do not feel confident to make a disclosure within the diocese or Church of England, you are encouraged to refer directly their relevant Local Authority or Constabulary.

### **Anonymous Disclosures**

We encourage everyone to identify themselves when making a disclosure. However, any anonymous disclosures will be investigated as far as reasonably possible based

upon the information provided. Please note it may not be possible to give feedback if information is passed on anonymously.

## **Whistleblowing Resources**

**Protect (formerly Public Disclosure at Work)** – A charity providing independent, free, confidential whistleblowing help and advice.

Protect Advice Line: <https://protect-advice.org.uk/contact-protect-advice-line/>  
Protect Advice Pages: <https://protect-advice.org.uk/advice-line/>  
Website: <https://protect-advice.org.uk/>