



Whistleblowing Policy

Reviewed September 2026

Next review scheduled September 2029

1. Policy Summary

- 1.1 The Whistleblowing Policy sets out the framework for raising and responding to concerns about wrongdoing in the public interest.
- 1.2 Whistleblowing is the disclosure of information about wrongdoing which is reasonably believed to be in the public interest. The Archdiocese encourages workers and others associated with its work to raise genuine concerns at the earliest opportunity. Concerns will be taken seriously, considered fairly and handled as sensitively as reasonably practicable and addressed in accordance with this policy.
- 1.3 The Archdiocese of Liverpool is committed to the highest standards of transparency, probity, integrity and accountability.
- 1.4 This policy is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.
- 1.5 This policy does not replace other policies and procedures such as the Complaints Policy, the Grievance Procedure and Positive Working Environment Policy and other specifically laid down statutory reporting procedures.
- 1.6 This policy reflects the whistleblowing provisions of the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998, the Employment Rights Act 2025 and subsequent legislation.

2. Scope

- 2.1. This policy applies to the Archdiocese and its subsidiaries and may be used by employees, workers, agency workers, office holders, clergy, Trustees / Directors, volunteers, contractors, parishioners and other people undertaking work for, or on behalf of the Archdiocese.
- 2.2. Access to this policy does not in itself confer statutory whistleblowing status. Whether a person is protected under the Employment Rights Act 1996 will depend on their legal status and whether their disclosure meets the statutory requirements.
- 2.3. This policy does not replace other Archdiocese of Liverpool policies or procedures. For example, if an employee has a grievance about their working

conditions, they should use the Archdiocese of Liverpool Grievance Policy or, if they felt that their manager or a colleague was treating them unfavourably, they should use the Archdiocese of Liverpool Positive Working Environment Policy.

- 2.4. A personal complaint made under one of the above policies may also contain a whistleblowing disclosure. The Archdiocese will consider the substance of the information and may apply more than one procedure where appropriate. An individual will not lose any applicable whistleblowing protection because they initially raised the matter under another procedure.
- 2.5. A qualifying disclosure for the purposes of whistleblowing legislation is a disclosure of information which the individual reasonably believes is made in the public interest and tends to show that one or more of the following has occurred, is occurring or is likely to occur:
- Criminal offences
 - Breach of a legal obligation
 - Miscarriages of justice
 - Danger to health and safety
 - Sexual harassment (within the meaning of section 26(2) of the Equality Act 2010, where the individual reasonably believes that disclosing the information is in the public interest).
 - Damage to the environment
 - Deliberate concealment of information relating to any of the above.
- 2.6 The Archdiocese also encourages concerns to be raised about fraud, corruption, misuse of charitable funds, abuse of authority and other serious unethical conduct. Depending on the facts, these matters may also fall within one or more of the statutory categories above.
- 2.7 Allegations made can be in the past, present or future i.e. the matter which is subject to disclosure has happened, is happening or is likely to happen.

3. Reporting

- 3.1. The Archdiocese of Liverpool recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty either to the Archdiocese of Liverpool and/or to those for whom the Archdiocese of Liverpool serves.

- 3.2. The Archdiocese of Liverpool will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.
- 3.3. The Archdiocese will not tolerate detrimental treatment because a person has raised, supported or participated in the consideration of a whistleblowing concern. Anyone who believes they have experienced such treatment should report it immediately through any of the reporting routes in this policy. Appropriate action will be considered where retaliation, threats or attempts to identify an anonymous whistleblower are established.

4. Confidentiality

- 4.1. The identity of the person raising the concern will be kept confidential so far as reasonably practicable. Information will be shared only where necessary to assess or investigate the concern, protect the individuals, comply with legal or regulatory duties, or ensure procedural fairness. Where it is necessary to disclose the individual's identity, this will normally be discussed with them beforehand unless doing so would prejudice the investigation, create a safeguarding risk or otherwise be inappropriate.
- 4.2. Similarly, if the allegation results in court proceedings, then the whistleblower may have to give evidence in open court if the case is to be successful.
- 4.3. The identity of the person raising the concern will not be disclosed more widely than is reasonably necessary. Any disclosure will be limited to those who need the information to assess or investigate the concern, protect individuals, comply with legal or regulatory requirements or ensure procedural fairness.

5. Anonymous Disclosures

- 5.1. This procedure encourages whistleblowers to put their name to an allegation wherever possible as anonymous disclosures may often be difficult to substantiate. Anonymous concerns will be considered on their merits. The ability to investigate, clarify the information or provide feedback may be limited where the person raising the concern cannot be contacted.
- 5.2. The Archdiocese encourages individuals to provide their name and contact details because this may assist assessment, investigation and feedback. The ability to investigate or provide an outcome may be limited where the person raising the concern cannot be contacted.

- 5.3. When assessing an anonymous concern, the Archdiocese will take into account:
- 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

6. Concerns that are not Substantiated

- 6.1. No action will be taken against a person because a genuinely held concern is not substantiated. A person raising a concern is not required to prove the wrongdoing. However, knowingly providing false information, fabricating evidence, or making a deliberately malicious allegation may be considered under the appropriate disciplinary or conduct procedure.
- 6.2. A conclusion that a concern is not upheld does not, by itself, mean that it was made maliciously.

7. How to Raise a Concern

- 7.1. It is preferable for allegations to be made to an employee's immediate manager / parish priest to whom they report, or in the case of a volunteer, the relevant supervisor. In the absence of the immediate line manager or supervisor, the issue should be raised with that person's superior.
- 7.2. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if the whistleblower believes that management is involved it would be inappropriate to raise it directly with them. The whistleblower may then make an allegation direct to any of the following:
- The Chief Operating Officer
 - Vicar General
 - Chair of Audit and Risk Committee via whistleblowing@rcaol.org.uk
- 7.3. If any of the above receive an allegation they will consider the allegation and may discuss with the Trustees.
- 7.4. Allegations of a safeguarding nature should be made to safeguarding@rcaol.org.uk
- 7.5. A concern about sexual harassment may also be considered under the Anti-Sexual Harassment Policy. A disclosure may engage both policies, and the

Archdiocese will consider the substance of the concern when deciding which procedure to use.

8. Allegation

- 8.1. Whether a written or oral report is made it is important that relevant information is provided including:
- The name of the person making the allegation and a contact point.
 - The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation).
 - The specific reason for the allegation. The person raising the concern should provide any information reasonably available to them that may assist the Archdiocese in understanding and assessing the concern. They are not expected to investigate the matter themselves or provide that wrongdoing has occurred.

Written allegations are preferred in order to ensure that information is clear and not misunderstood and can be escalated easily if required.

- 8.2. Someone making an allegation may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure the right to be accompanied will at that stage be in accordance with the relevant procedure.

9. Action on receipt of a Concern

- 9.1. The line manager will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:
- The record of the allegation:
 - The acknowledgement of the allegation.
 - Any documents supplied by the whistleblower.
- 9.2. An investigator will be appointed by the Chief Operating Officer, Vicar General or Chair of Audit and Risk Committee.
- 9.3. The investigator must have the appropriate skills and authority and be free from any actual or reasonably perceived conflict of interest. Where the concern involves a person who would ordinarily appoint or oversee the investigator,

responsibility will pass to another appropriate senior person, the Chair of the Audit and Risk Committee or an external investigator.

- 9.4. The investigator will ask the whistleblower for their preferred means of communication and contact details and use these for all communications with the whistleblower in order to preserve confidentiality.
- 9.5. If the allegation relates to fraud, potential fraud or other financial irregularity the Director of Finance will be informed within 5 working days of receipt of the allegation.
- 9.6. If the allegation discloses evidence of a criminal offence, it will immediately be reported to the Chief Operating Officer and Archdiocesan Solicitor and a decision will be made as to whether to inform the Police, and, where appropriate, a report to the Charity Commission of a Serious Incident. If the allegation concerns suspected harm to children, the appropriate authorities and the Safeguarding Co-ordinator will be informed immediately.
- 9.7. If the issue is around suspected harm to vulnerable adults the appropriate authorities and the Safeguarding Co-ordinator will be informed immediately.
- 9.8. Other statutory and non-statutory agencies may be contacted if necessary depending on the circumstances.

10. Timetable

- 10.1 An acknowledgement of the allegation in writing within 5 working days of receipt with:
 - An indication of how the Archdiocese of Liverpool proposes to deal with the matter.
 - An estimate of how long it will take to provide a final response.
 - Agreed intervals for periodic updates
 - Information on whistleblower support mechanisms
 - An explanation if no investigation will take place
- 10.1. Where the allegation has been made internally and anonymously, obviously the Archdiocese of Liverpool will be unable to communicate what action has been taken.

11. Support

- 11.1. The Archdiocese of Liverpool will take steps to minimise any difficulties which may be experienced as a result of making an allegation. For instance, if a whistleblower is required to give evidence in criminal or disciplinary

proceedings the Archdiocese of Liverpool will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available.

- 11.2. The Archdiocese of Liverpool accepts that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, those making allegations will be advised of the outcome of an investigation.
- 11.3. If a whistleblower is dissatisfied with the outcome of raising an issue under this policy, the individual has the right to express their concerns to the relevant Prescribed Person designated by the Public Interest Disclosure (Prescribed Persons) Order 2014 or any statute or statutory instrument which subsequently supersedes this legislation. This information is available on gov.uk.

12. Responsibility for the Policy

- 12.1. The Chief Operating Officer has overall responsibility for the operation of this Procedure and for determining the administrative processes to be followed and the format of the records to be kept.

13. Compliance and Monitoring

- 13.1. A Register will record the following details:
 - The name and status (e.g., employee) of the person raising the concern
 - The date on which the allegation was received.
 - The nature of the allegation
 - Details of the person who received the allegation.
 - Whether the allegation is to be investigated and, if yes, by whom
 - The outcome of the investigation
 - Any other relevant details
- 13.2. The Register will be confidential and only available for inspection by the Board of Trustees and will be used for the purpose of continuous improvement. The Register will be access-restricted, stored securely and retained in accordance with the Archdiocese's data retention schedule.
- 13.3. The Chief Operating Officer will report annually to the Board of Trustees on the operation of the Policy and on the whistleblowing allegations made during the period covered by the report. The report will be in a form which does not identify whistleblowers.

14. Awareness

- 14.1 Awareness of this policy will be raised via employee intranet, newsletters and will be flagged to employees on a cyclical basis.

15. Policy Review

- 15.1 This policy will be reviewed every 3 years unless legislative change or business need deems an earlier review is necessary.