



## Expressing Non-Safeguarding Concerns and ‘Whistleblowing’: Policy and Guidance

### Introduction

Whistleblowing plays a valuable role in detecting and reducing serious problems within organisations. Encouraging people to express concerns appropriately and in a timely fashion is an important aspect of a caring church culture. At the most simple level, anyone can spot a genuine concern and it is important that everyone who does so feels safe to raise that concern. At a more fundamental level, organisations – including the church – can become hierarchical and opaque, and a strong whistleblowing policy recognises the importance of empowering those who may not hold positions of structural influence within the organisation to feel confident enough to speak out, should they believe poor practice to be present.

The aim of this policy and associated guidance is to provide a clear and transparent way for anyone involved in the Emmanuel Parish to raise genuine concerns regarding poor practice that impacts upon the safety or wellbeing of anyone to whom the church ministers. It also aims to ensure that any concerns are dealt with effectively and in a timely fashion. The kinds of concerns that this policy covers include:

- a criminal offence (including fraudulent and corrupt behaviour, e.g. theft, fraud or malpractice)
- bullying, controlling or coercive behaviour
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing serious damage to the environment
- a breach of any other legal obligation, or
- concealment of any of the above

This policy and guidance provides a simple set of steps to deal with concerns, ensuring that people are not penalised for raising genuine concerns, even if those concerns appear to be unfounded.

This policy and guidance applies to everyone involved in Emmanuel Parish, including all workers who are involved on either a paid or voluntary basis. **Like all parish policies, this policy should be easily available for all – for instance at the back of church and on the church website. It should not be necessary for someone who wants to see this policy to ask a leader within the church to provide it.**

## **Our Commitment:**

- We recognise that creating a safe church culture is everyone's responsibility.
- We welcome, encourage and urge anyone who is concerned about any aspect of our practice or provision to raise those concerns, as outlined in the Guidance below.
- We welcome, encourage and urge anyone who is concerned about the safety and welfare of a church member to report those concerns as outlined in the Guidance below.
- We undertake to treat all such concerns seriously, as outlined in the Guidance below.
- We guarantee that no-one who raises any concern in good faith, even if those concerns are ultimately found to be unfounded, will face any adverse consequences whatsoever.

## **Guidance**

### **What to do if you have a concern**

- In the first instance, speak to the leader of the area of church about which you have a concern (for instance, if your concern is about Sunday Club, speak to the Sunday Club Supervisor). A good principle is that concerns should be dealt with at the lowest level necessary and only escalated beyond that if the concerns remain. However, if your concern is about the behaviour of a leader in the church (lay or ordained), you may feel that you need to escalate it to someone in authority over them; you would be perfectly justified in doing this.
- Try to be as specific as possible: what or whom are you concerned about exactly? Can you give specific dates or examples of what has caused your concern? Vague concerns are difficult to investigate. If you only have an impression, or cannot give specific examples, you may still wish to express concerns but be open about the limited details you have.
- Try to avoid language that is either accusatory or emotive: your aim is to improve an area of church life, not to put the recipient of your concern on the defensive.
- It is very helpful to quote policy, if you can (although if you cannot, this is not a reason to avoid expressing your concern). This helps the person receiving your concern to see very quickly that you are simply holding the church to account with regard to its own policies, or to Diocesan policies.
- Face-to-face is usually best, but follow up the conversation in writing. "Last Sunday after church I expressed a concern about X, you replied by saying Y, and you said you would get back to me by Z. Please could you reply by confirming my understanding of our conversation is correct": a simple written communication such as this can assist greatly in providing clarification to all concerned about what was said (although see the guidance below for the person receiving the concern along similar lines).
- If you are satisfied that your concern has been resolved, you can leave the matter there. If you are not, it is important that you escalate it. We suggest that a suitable 'order of escalation' would be:
  - 1. Lay Leader in Church (e.g. Families Worker)**
  - 2. Incumbent (and/or churchwarden in a vacancy)**
  - 3. Archdeacon or Rural Dean**
  - 4. Bishop**
- In escalating your concern, you are acting in an entirely appropriate way. Creating a safe church culture is everyone's responsibility; there may be the rare occasion where you just have to raise your concern outside of your local parish context in order to ensure that the people your church ministers to are safe.
- If you feel that the concern has great urgency and cannot be escalated in this manner (for instance if you are concerned about the safety or welfare of a church member), then you

must raise those concerns without delay with the appropriate statutory authority, such as the police.

### **What to do if you receive a concern**

- If someone tells you that they have a concern, you should arrange to meet him/her as soon as possible.
- Approach the situation sensitively, recognising the discomfort that the person may feel. Offer to meet him/her away from the church if they wish, and allow them to bring a friend if that would help.
- Do not promise confidentiality: you may be required to pass on the concerns raised to the police or other authority. You can, however, promise to exercise discretion in dealing with whatever you are told.'
- However, be prepared to discuss the possibility of anonymity for the person sharing the concern. People may have reasons to want to stay anonymous, even if they know they have to say something, and closing this option off may mean that the concern never gets aired.
- Reassure the person that there will be no negative repercussions for any concern shared in good faith – even if it turns out to be unfounded or mistaken. 'Concerns' shared out of malice or divisiveness are a different matter, but at this stage, assume the person is acting in good faith.
- You may wish to suggest sources of support for the person – especially if they are on their own without the support of a friend or family member. Sharing concerns in an institutional context can be very intimidating – even in church – and the concern may have been a source of great anxiety for a long time. The person may be sharing the concern with you because this anxiety has reached the point where they feel compelled to act and in coming to you they are expressing a great measure of faith that they will be well-received, and not have their intentions misinterpreted. They may wish to speak to someone outside of the immediate context to receive some pastoral support (for instance from a neighbouring parish).
- Recognise that not everyone expresses genuine concerns appropriately. Someone can say something in the wrong manner, at the wrong time and with the wrong language – but still be right. Don't be too quick to dismiss what someone says because of how they say it.
- Make notes of the conversation, ideally at the time or immediately afterwards.
- Follow-up your conversation in writing, as soon as you can. 'On date X, you expressed your concerns about Y. I replied by saying I would look into what you said, and would get back to you by date Z'. This helps provide clarity for all involved.
- Make sure you are clear about what you will do with the concern, by when you will do it and when you will let the person know. Give the person a clear indication of when they can expect to hear back from you, and keep to this promise even if you have made no progress – hearing from you with no news is better than not hearing from you.
- The crucial principle for any adequate Whistleblowing policy is that anyone raising any concern in good faith – whether or not that concern is ultimately justified – should suffer no adverse consequences whatsoever.