

Guidance on Whistleblowing



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This guidance is for volunteers working with children, young people and adults at risk within the parishes of the Diocese of Down and Connor.

This whistleblowing guidance is not designed to replace the need to report allegations, suspicions, knowledge, and concerns about the abuse of a child, young person or adult at risk. [\(See Guidance on Reporting\)](#). [\(LinkTBC\)](#)

This guidance is designed for volunteers who may, from time to time, feel that they need to raise certain issues relating to their engagement as a volunteer in the Diocese with someone in confidence.

A Diocesan Whistleblowing Policy for staff working in the Down and Connor Diocese is available and can be accessed on the Diocesan intranet.

Safeguarding children, young people and adults at risk requires those working with children, young people, adults at risk, and families to be committed to the highest possible standards of openness, integrity, and transparency. Volunteers must acknowledge their individual responsibility to bring matters of concern to the attention of senior management and/or relevant statutory agencies.

Although this can be challenging, for example, you may be the first to recognise that something is wrong, but you may not feel able to express your concerns due to a feeling that this would be disloyal to colleagues, or you may fear harassment or victimisation, these feelings however natural, must never result in a child, young person or adult at risk continuing to be unnecessarily at risk.

Remember, it is often the most vulnerable children, young people and adults at risk, who are targeted. These children, young people and adults at risk need an advocate to safeguard their welfare.

Don't think, 'what if I'm wrong?' Think, 'what if I'm right!'

Share your concerns rather than walking away or doing nothing.

Aims and Scope of this Guidance

This guidance aims to:

- Encourage all volunteers to feel confident in raising serious concerns and to question and act upon concerns about practice.
- Provide avenues for you to raise those concerns and receive feedback on any action taken.
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- Reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in good faith.
- Ensure that you understand how to handle personal information properly and safely in accordance with the [Data Protection Act 2018](#) and other relevant data protection laws.

What is Whistleblowing?

Whistleblowing can be defined as 'raising concerns about wrong-doing or misconduct within an organisation or within an independent structure associated with it'.

It differs from raising concerns about allegations of abuse. It is when someone, who works for, or in an organisation (in a paid or voluntary capacity) wishes to raise concerns about malpractice in the

organisation or practice which falls below the standards set out in **A Safe and Welcoming Church; Safeguarding Children Policy and Standards for the Catholic Church in Ireland 2024. NBSCCCI.**

The concern could relate to:

- A breach of the Diocese of Down and Connor's child safeguarding procedures.
- A breach of the law.
- Failure to comply with legal obligations.
- A possible miscarriage of justice.
- A health and safety risk.
- Damage to the environment.
- Misuse of public money.
- Corruption or unethical conduct.
- Deliberate concealment of any of these matters and the cover-up of these.

Those in ministry within the Church have certain common law confidentiality obligations to the Diocese. However, in a limited set of circumstances, whistleblowing may override these obligations if a person has information which they believe will not be addressed properly within the Diocese.

This guidance sets out the circumstances under which these disclosures may lawfully be made. In the case of safeguarding, these concerns are likely to be about activity that presents a possible risk to children, young people and adults at risk or systemic failure/acts of omission, in relation to children, young people and adults at risk and/or the services they receive. It applies when you have no vested interest and are reacting as a witness to misconduct or malpractice that you have observed. It is important to check out your concerns with those who are in a position to assess and deal with such matters appropriately.

Legislation Underpinning Whistleblowing

In Northern Ireland, the law that covers

whistleblowing is **The Public Interest Disclosure (Northern Ireland) Order 1998, (as amended in October 2017).**

Within the Diocese of Down and Connor this guidance applies if you are a volunteer. Blowing the whistle is more formally known as 'making a disclosure in the public interest'. The law states the importance of disclosing concerns, knowing that you are protected from losing your role and/or being victimised because of what you have uncovered and made public.

Harassment or Victimisation

The Diocese of Down and Connor is committed to good practice and maintaining high standards. It wishes to be supportive of all who contribute to its work.

However, the Diocese recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to your parish and those for whom you are providing a service.

The Diocese will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. Whilst reporting may remain confidential, in most instances this cannot be guaranteed. Everyone has the right to know who makes a complaint against them. This should not deter one from raising the concern but is a reminder of the importance of providing evidence to support the concern. At the appropriate time, you may need to come forward as a witness.

Anonymous Allegations

This guidance encourages you to put your name to your allegation whenever possible. Concerns expressed anonymously will be considered and addressed but will be treated with extra caution and at the discretion of the Diocese of Down and Connor. It should be remembered that wherever possible, confidentiality will be preserved. In exercising this discretion, the factors to be taken account of would include:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

Anonymous allegations may be impossible to verify and will not generally provide sufficient scope for a full and proper investigation within the terms of this policy. Anonymous allegations will, therefore, be considered on a case-by-case basis at the sole discretion of the Diocese of Down and Connor and may be rejected without any further action being taken.

Untrue/Unfounded Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, further action, may be taken against you.

How to Raise a Concern

- You should voice your concerns, suspicions, or uneasiness as soon as you feel you can. The earlier a concern is expressed, the easier and sooner action can be taken.
- Try to pinpoint exactly what practice is concerning you, and why.
- You may wish to consider discussing your concern with a friend or colleague first, and you may find it easier to raise the matter if there are two (or

more) of you who have had the same experience or have the same concerns.

- Approach your immediate group leader or Designated Liaison Person (DLP) for the Diocese of Down and Connor. If your concern is about your immediate group leader, speak to the DLP, or if you feel you need to take it to someone outside of the Safeguarding Office, then contact the Diocesan Curia, the statutory services, or the NBSCCCI.
- Confirm your concerns with factual information (dates, times details, history, giving names, dates, locations and any other relevant information) in writing.
- The reason why you are particularly concerned about the situation.
- You are not expected to prove the truth of your disclosure, but you need to demonstrate sufficient grounds for concern.
- Seek a satisfactory response in writing; do not let matters rest. If you do not receive a written response within a reasonable timeframe, write again seeking a written response. A failure to respond should be included in any further disclosure to the statutory authorities or the NBSCCCI.
- Follow up if the person to whom you reported has not responded within a reasonable time period and if that follow up is not acted upon, report the matter to the relevant statutory authorities.

Please note that the information provided will be held on file in accordance with the [Data Protection Act 2018](#), the [Data Protection Policy of the Diocese of Down and Connor](#) and the [Privacy Notice of the Down and Connor Safeguarding Office](#).

Diocesan Response

The Church personnel to whom the disclosure is made should acknowledge receipt in writing within seven days of receiving it.

This person to whom you report your concerns under

this guidance must, in turn, report them to the DLP within five working days. If the concern raised indicates immediate risk, it would be expected that this be brought to the attention of the Diocesan Safeguarding Office immediately and no later than within twenty-four hours.

The Church personnel to whom the disclosure is made should keep detailed notes of the disclosure, action taken, who was consulted and the outcome of the inquiries.

The Diocese of Down and Connor will respond to your concerns. Relevant information on the nature and progress of any enquiries resulting from the concern may be shared with the person who made the disclosure. It is acknowledged that confidential sensitive data cannot be shared so the response should include general information about internal inquiries and statutory referrals made. Do not forget that testing out your concerns is not the same as either accepting or rejecting them.

Where appropriate, the matters raised may be investigated by management, internal audit, through the disciplinary process, be referred to the police, be referred to an external auditor i.e., NSBCCCI forming the subject of an independent inquiry.

To protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The overriding principle which the Diocese of Down and Connor will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, child, young person safeguarding, adult safeguarding, and discrimination or harassment issues) will normally be referred for consideration under those procedures. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted. Within seven working days of a concern being raised, the Diocese will write to you: acknowledging that the concern has been received indicating how the Diocese proposes to deal with the

matter giving an estimate of how long it will take to provide a final response, telling you whether any initial enquiries have been made supplying you with information on support available from the Diocese and telling you whether further investigations will take place and if not, why not.

The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, the Diocese will seek further information from you. Where any meeting is arranged, off-site if you so wish and you can be accompanied by an appropriate companion at the agreement of the Diocese.

The Diocese of Down and Connor will take steps to minimise any difficulties which you may experience because of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Diocese will arrange for you to receive advice about the procedure and you may also wish to contact the support officers.

The Diocese of Down and Connor accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation, but any information needs to be kept confidential.

A volunteer is not expected to prove the truth of an allegation but will need to demonstrate sufficient grounds for the concern.

What Happens Next?

You should be given information on the nature and progress of any enquiries. The Diocese of Down and Connor has a responsibility to protect you from harassment or victimisation. No action will be taken against you if the concern proves to be unfounded and was raised in good faith.

Self-Reporting

There may be occasions when a volunteer has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their competence. Volunteers have a responsibility to discuss such a situation with their group leader, so that support can be offered to the volunteer concerned. While such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children, young people and adults at risk.

External Disclosures

Disclosure to an external person, other than statutory bodies, government officials or the NBSCCCI. A disclosure made to an external person, for example, a journalist, may be a protected disclosure if it meets several conditions:

- You must reasonably believe that the information disclosed, and any allegation contained in it, are substantially true.
- You must not make the disclosure for personal gain.
- For making of the disclosure in public in all the circumstances, to be reasonable, at least one of these conditions must be met:
 - At the time you make the disclosure you must reasonably believe that you will be penalised if you make the disclosure to the Church.
 - Authority, statutory personnel or a government minister, or NBSCCCI.

- Where you reasonably believe that it is likely that the evidence will be concealed or destroyed if you make the disclosure directly to the Diocese, statutory body, or NBSCCCI.
- You have previously made a disclosure of substantially the same information to the Diocese, statutory personnel, government minister or NBSCCCI.
- The wrongdoing is of an exceptionally serious nature.

Support and Advice

It is recognised that whistleblowing can be difficult and stressful.

Advice and support are available from the Safeguarding Office by contacting: 028 9049 2798

Alternatively, you can seek advice from the Charity, "Advice Ni" <https://www.adviceni.net/>

"Absolutely without fail – challenge poor practice or performance. If you ignore or collude with poor practice it makes it harder to sound the alarm when things go wrong."

(Reproduced with acknowledgement to "Sounding the Alarm" – Barnardo's)

Relevant Forms

SO22

USEFUL RESOURCES

- **Dept for the Economy Guide to the Public Interest Disclosure (Northern Ireland) Order 1998**
- **Data Protection Act 2018**
- **National Board for Safeguarding Children in the Catholic Church in Ireland (NSBCCCI)**
- **<https://www.adviceni.net/>**
- **Down and Connor Privacy Notices**