



Whistleblowing Policy

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Introduction

The Diocese of Blackburn is committed to the highest possible standards of integrity and recognises that clergy, BDBE/F employees and BDBE/F 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 welcomes clergy, BDBE/F employees and volunteers who have a serious disclosure about any aspect of the Diocese's work to come forward and voice those concerns in confidence without fear of reprisals.

Employed parish staff and volunteers will come under any PCC whistleblowing policy. The Diocese encourages PCCs to make similar provision to extend whistle-blowing protection for those who are not workers.

We recognise that raising a whistleblowing concern can be daunting. However, we encourage you to report concerns internally as soon as possible where you suspect wrongdoing. We are here to listen and will take all concerns that you raise seriously.

This policy sets out the procedure for raising a whistleblowing concern and the support and protection that is available to you when you do so.

If your concern relates to a personal grievance that is not in the public interest (for example, an allegation of bullying or harassment), you should raise it under the relevant BDBE/F policy or clergy diocesan policy. If you are unsure what policy applies, please speak to your Line Managers or archdeacon who will advise.

Whistleblowing concerns to which this policy relates

Whistleblowing is the act of reporting suspected wrongdoing or risk of wrongdoing relating to:

- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- a risk to the health and safety of an individual;
- damage to the environment; or
- an attempt to cover up any of the above.

It is not necessary for you to prove the wrongdoing. However, to be protected by whistleblowing laws against detrimental treatment or dismissal, you must reasonably believe that wrongdoing (related to one of the categories listed above) is being, has been, or is likely to be committed and that your disclosure is in the public interest.

Stage 1 - Raising a whistleblowing concern

Any safeguarding whistleblowing disclosure that cannot be dealt with using the usual procedure for responding to safeguarding concerns or allegations, should be made to the Diocesan Safeguarding Team.



For clergy wishing to make non-safeguarding related public interest disclosures should contact the relevant archdeacon (or another archdeacon if necessary);

Archdeacons should contact the bishop of Blackburn;

For people in lay ministries which are licensed or authorised by the bishop initial contact should be made with the incumbent (or archdeacon if the incumbent is unavailable);

For those with a 'proper interest', it may be more appropriate to bring a specific complaint about clergy through the clergy discipline measure 2003;

BDBE/F employees or volunteers should contact the Director of Education or Diocesan Secretary.

Any concerns should be in writing. It is important that you set out clearly:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- and what action (if any) you are seeking.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible. You may, if you wish, bring a supporter/colleague or a trade union representative with you to the meeting. Where it is considered appropriate, a member of the BDBE/F HR department may also be present.

Depending on the nature of concern the matter maybe referred to Police and/or other statutory agencies.

Stage 2 - Responding to your whistleblowing concern

The person to whom you raised your concern will decide if an investigation is required and, if it is, the most appropriate person to conduct it. The relevant person will write to you confirming that they are investigating and the timescale for completion. An initial part of the investigation will involve assessing whether the disclosure is a 'qualifying disclosure' or whether it would be more appropriately dealt with through another relevant policy or process.

The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing.

Following the investigation, the relevant person will inform you in writing, as quickly as possible after completion of the investigation, of the outcome and any next steps or action that will be taken. While we aim to provide you with comprehensive feedback, in some cases this may not be possible, for example where data protection rules apply or there are sensitive issues that need to remain confidential.

Stage 3 – Appeal

If you are not satisfied with how your concern has been dealt with, you should appeal to the



person who handled the original concern or the BDBE/F HR department.

You should raise your appeal in writing. It is important that you set out clearly the grounds of your appeal, i.e. the basis on which you consider that your original concern has not been satisfactorily dealt with.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your appeal. This will be arranged as soon as possible. You may, if you wish, bring a supporter/colleague or a trade union representative with you to the meeting. Where it is considered appropriate, a member of the HR department may also be present.

The relevant person will consider your grounds for appeal and review the way your original whistleblowing concern was handled. You will be informed in writing of the outcome as quickly as possible.

Confidentiality and anonymity

We want you to feel comfortable about raising a whistleblowing concern openly and actively encourage you to do so.

Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand.

In the alternative, you may decide to raise a whistleblowing concern anonymously. You can do this via an anonymous letter.

We encourage anonymous reporting over remaining silent. Although we will investigate any concern that is reported anonymously as best we can, an anonymous report is likely to be more difficult for us to investigate, and we will not be able to provide you with any feedback.

Our commitment to you

You have the right not to be subjected to any detrimental treatment because you have raised a whistleblowing concern.

If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with adequate support and protection.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to the relevant archdeacon or the Chair of the Board of Finance or Education.

If we find that an individual has knowingly raised false allegations, this will be treated as a disciplinary offence for BDBE/F employees or volunteers and a potential clergy disciplinary measure for clergy.



Special note: Safeguarding

The Diocese of Blackburn 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.

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.

Raising your whistleblowing concerns externally

We encourage you to raise your whistleblowing concerns internally in the first instance. If you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person (see list on [GOV.UK](https://www.gov.uk)).

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.

This policy does not form part of your contract of employment or terms of service and we reserve the right to amend or withdraw it at any time.

Further guidance

If you need further guidance or support, you can contact the whistleblowing charity [Protect](https://www.protect-advice.org.uk) or [Citizens Advice](https://www.citizensadvice.org.uk) for free confidential advice.

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

Advice line:

<https://protect-advice.org.uk/advice-line>

<https://protect-advice.org.uk/contact-protect-advice-line>

<https://protect-advice.org.uk/advice-line>