



## DIOCESE OF SODOR AND MAN

### WHISTLEBLOWING POLICY

This policy supersedes any previous policy of this nature. It will be reviewed as appropriate, and amended where any clarification or actions are needed, and at a minimum 2 yearly.

Date of Approval	
Date Due for review	

10/11/2020

# WHISTLEBLOWING POLICY

## 1. Introduction

Whistleblowing is where an individual raises concerns with an organisation or regulatory body of suspected wrongdoing at work. Officially this is called 'making a disclosure in the public interest'.

### 1.1 Wrongdoing may include (but is not limited to):

- Behaviour likely to damage the reputation of the Diocese
- A criminal offence
- A breach of a legal obligation
- A miscarriage of justice
- A danger to the health and/or safety of an individual or individuals (be that another employee, a customer, a member of the public or any other person)
- Damage to the environment
- Deliberate concealment of any of the above
- deliberate covering up of information tending to show any of the above five matters.

1.2 It should be noted that in making a disclosure the worker must have reasonable belief that the information disclosed tends to show one or more of the offences or breaches listed above ('a relevant failure') and have evidence to support this belief. The belief need not be correct - it might be discovered subsequently that the worker was in fact wrong - but the worker must show that he held the belief, and that it was a reasonable belief in the circumstances at the time of disclosure.

1.3 In line with the provisions in the Employment Act 2006 the Diocese of Sodor and Man wish to encourage any employee /office holder or volunteer in their management to alert them to any potential problems reasonably believed to exist, without fear of any negative reprisal in response to his/her revelation, be that fear of dismissal, denial of promotion or pay prospects, or any other detrimental treatment.

This policy is in place to ensure that an internal process is available to encourage and enable workers and volunteers to raise serious concerns which would not meet the criteria for a complaint, in confidence and without fear of reprisals, to ensure the Diocese of Sodor and Man continues to provide the highest standards of integrity and accountability.

1.4 The Diocese of Sodor and Man rely heavily upon the contribution of volunteers and recognise that they are in an important position to recognise and report concerns. While voluntary roles are not included within the scope of the Act, The Diocese of Sodor and Man encourages volunteers to use this process with the relevant principles of protection applied to them wherever possible.

1.5 The policy is not designed to question business or financial decisions taken by its Boards nor to reconsider any matters which have already been addressed under disciplinary, grievance, complaint or other procedures.

It specifically includes concerns about safeguarding and promoting the welfare of children and vulnerable adults. However, if a child or vulnerable adult may be at risk of harm the Ecumenical Safeguarding Adviser and Coordinator should be contacted as below:

## **Ecumenical Safeguarding Adviser and Coordinator**

Tony Connell

Mobile: 07624 235970

Email: [safeguarding@sodorandman.im](mailto:safeguarding@sodorandman.im)

In an emergency, if you consider a child or vulnerable adult is at risk of immediate harm call the police on 999 or Adult or Children's Services. You should also contact the Ecumenical Safeguarding Adviser and Coordinator as soon as is practically possible and within 24 hours at the latest.

## **2. Principles**

### **2.1 This policy is based on the following fundamental principles:**

- All Office Holders, lay staff and volunteers have the right to raise concerns about perceived unacceptable practice or behaviour.
- All Office Holders and lay staff are responsible for raising concerns about unacceptable practice or behaviour, safeguarding concerns and any health and safety risks. We also invite volunteers to raise these matters.
- The Diocese of Sodor and Man does not tolerate victimisation or harassment and will take action to protect Office Holders, lay staff and volunteers when they raise a concern in good faith.
- The Diocese of Sodor and Man will endeavour to protect the identity of any individual who raises a whistleblowing concern and wishes to remain anonymous. However, in certain circumstances, such as any inquiry arising from the concern, 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 a risk to others involved. The reasons for this would be discussed with the individual.
- Malicious, vexatious or frivolous use of the process will result in disciplinary action against the employee invoking or seeking to invoke the procedure.
- All proceedings, witness statements and records will be kept confidential as far as is possible (see comments on disciplinary process above).

## **3. Procedure**

### **3.1 Scope and Purpose**

The Whistleblowing Procedure applies to all employees, office holders and volunteers in the direct management of the Diocese of Sodor and Man, the Diocesan Board of Finance Limited and employees on secondment from other organisations.

### **3.2 The circumstances in which disclosures are protected**

A qualifying disclosure will be a protected disclosure where it is made

- to the worker's employer, either directly to the employer or by procedures authorised by the employer for that purpose (e.g. a telephone hotline); or
- to a person other than his or her employer whom the worker reasonably believes exercises responsibility for and has legal control over the conduct of the person who is responsible for the relevant failure.

### **3.3 Process**

See Appendix 1 for flowchart summarising each stage of resolving complaints

### 3.4 To whom should I blow the whistle?

#### **The Lord Bishop of Sodor and Man**

The Right Reverend Peter Eagles  
Telephone: +44 1624 622108  
Email: bishop@sodorandman.im

Office address:

Thie yn Aspick  
4 The Falls  
Douglas  
IM4 4PZ

#### **Bishop's Chaplain**

Telephone: + 44 1624 622108  
Email: chaplain@sodorandman.im

#### **Human Resources**

Mrs Cat Macdonald  
Telephone: +447598956290  
Email: hr@sodorandman.im

### 3.5 If the matter is not satisfactorily resolved

If an individual remains dissatisfied with the outcome of this procedure they have the right to express their concerns to the relevant Prescribed Person designated by the Public Interest Disclosure (Prescribed Persons) Order 2016.

### 3.6 Retraction of a disclosure

Once a disclosure has been made, it may be retracted at any time, although the Diocese reserves the right to proceed with an investigation if deemed appropriate, even where the person who made the disclosure no longer wishes to proceed.

## 4. Data Protection

When an individual makes a disclosure, the Diocese of Sodor and Man will process any personal data collected in accordance with its Data Protection Policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

## 5. External support

Independent, free, expert help and advice in relation to whistleblowing is also available [here](#)

**APPENDIX 1 – FLOWCHART OF WHISTLEBLOWING PROCESS**

