

**INSTITUTE OF CHRIST THE KING SOVEREIGN PRIEST UK**  
(hereinafter referred to as the ICKSP, or the GB Province)



## Whistleblowing Policy

<b>Policy Author(s)</b>	Canon Montjean – Provincial and Safeguarding Lead Kevin Jones - Trustee
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<b>Version No.</b>	<b>Type of Change</b>	<b>Date</b>
0.1	New draft policy created	06/06/2025
0.2	Significant re-write to simplify	10/04/2026
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## **INTRODUCTION**

*“Whistleblowing is a term used to refer to the internal or external disclosure of malpractice as well as illegal acts, or omissions, at work.”*

People who work within the Catholic Church in England and Wales, employees, office holders or volunteers, are often the first to realise that there may be something seriously wrong within the Church. They may not, however, express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Church.

They may also fear harassment or victimisation. In these circumstances it may feel easier to ignore the concern rather than report what may just be a suspicion of malpractice. This whistleblowing policy is intended to encourage and enable anyone with a serious concern, to raise concerns without fear of victimisation, subsequent discrimination or disadvantage.

The scope of this policy covers any volunteers making qualifying disclosures about malpractice as well as illegal acts within the ICKSP, hereinafter referred to as the GB Province.

## **POLICY PURPOSE**

The GB Province is firmly committed to openness, honesty, and accountability. This policy sets out the steps that any staff member, member of clergy, volunteer, or Trustee Board member should take if they suspect that someone or something within the Province at any level is creating risk or behaving illegally or unethically.

## **POLICY SCOPE**

The GB Province encourages all members to raise concerns whenever they reasonably believe that wrongdoing has happened, is happening, or may happen.

## **A DEFINITION OF WHISTLEBLOWING**

*Raising a serious concern about wrongdoing, poor practice, or safeguarding risks within a Church body, in the public interest, so that the concern can be addressed without fear of reprisal.*

Whistleblowing is different from complaints, individual grievances, or employment disputes.

It is the policy of this Province to protect anyone who honestly and reasonably believes that improper or illegal practices are occurring and provides a confidential environment in which to report such concerns. Anyone raising an issue under this policy is protected from detrimental treatment, including dismissal, for making a disclosure.

All concerns raised will be taken seriously, fully investigated, and handled without any form of reprisal.

The GB Province will comply with all relevant legislation that prohibits retaliation against good-faith whistleblowers, including the Public Interest Disclosure Act 1988.

Examples of concerns that may be raised through whistleblowing include:

- **Safeguarding concerns** that indicate a child or adult at risk is being harmed, neglected, exploited, or placed in danger, including failures to follow safeguarding procedures or respond appropriately to disclosures.
- **Behaviour by clergy, religious, staff, or volunteers** that is abusive, harmful, exploitative, coercive, or otherwise inconsistent with the standards of conduct expected in ministry or Church service.
- **Serious breaches of safeguarding governance**, including failure to report allegations, failure to escalate concerns, or attempts to obstruct or influence safeguarding processes.
- **Criminal conduct** such as fraud, theft, abuse, exploitation, or any unlawful activity connected to the work of the Church body.
- **Misuse of authority or position**, including bullying, intimidation, coercion, or behaviour that creates a culture of fear or silence.
- **Cover-ups or deliberate concealment** of safeguarding concerns, misconduct, or reportable incidents.
- **Systemic or organisational failures** that compromise safeguarding practice, risk management, or compliance with CSSA standards.
- **Health and safety risks** that endanger children, adults at risk, parishioners, volunteers, or staff.
- **Financial irregularities or misuse of charitable funds**, including improper accounting, unauthorised expenditure, or conflicts of interest.
- **Failure to comply with legal or regulatory obligations**, including charity law, data protection, safer recruitment, or statutory safeguarding duties.
- **Any behaviour that undermines the integrity, transparency, or trustworthiness of the Church body**, or damages its ability to safeguard effectively.

It is the policy of the GB Province to:

- **Protect anyone who raises a whistleblowing concern** from personal claims, victimisation, harassment, or bullying arising from their disclosure.
- **Ensure no disciplinary action is taken** against any individual who makes a disclosure in good faith; their position must not be harmed or hindered as a result of raising a concern, whether or not the concern is ultimately substantiated.
- **Prohibit any form of reprisal** or similar action against a whistleblower for making a protected disclosure under this policy, including actions that could amount to misconduct or lead to disciplinary consequences.

Whistleblowing about wrongdoing or unacceptable behaviour is always the right and responsible action to take.

## **DUTY OF CARE TO BLOW THE WHISTLE**

Failure to report any concern covered by this policy, when a person is reasonably aware of or certain about it, to the GB Province (either to their Superior or the Trustees) will be treated as a breach of safeguarding responsibilities and may amount to misconduct.

## **RAISING A CONCERN – BLOWING THE WHISTLE**

If an individual has reason to believe that unsafe, unethical, or illegal practices are taking place within GB Province, they are encouraged to report their concerns without delay. Concerns should be raised as follows:

### **1. Initial point of contact**

Concerns should be raised with the priest responsible for the local apostolate, either verbally or in writing. If the concern involves, relates to, or could compromise that priest, the Whistleblower should contact the Provincial or a Trustee of the GB Province Charity. Clergy and seminarians may alternatively raise concerns directly with the Mother House at Gricigliano.

### **2. Stating the concern**

The Whistleblower should make clear that they are raising a concern under this Whistleblowing Policy and provide all relevant information, including key facts, dates, and the names of those involved.

### **3. Anonymous disclosures**

Anonymous reports will be considered; however, anonymity can limit the ability to investigate thoroughly, safeguard those involved, or provide feedback. For these reasons, anonymous disclosures are discouraged.

### **4. Meeting with the Whistleblower**

The Whistleblower will be invited to a meeting to discuss their concern. They may be accompanied by a representative at this and any subsequent meetings. All discussions between the Whistleblower and their representative **must** remain confidential throughout the process.

### **5. Investigation**

Following the initial meeting, a nominee of the **GB Province** (either the Provincial, Vice Provincial or other designate of the Provincial) will investigate the concern and may request further meetings. Where necessary, specialists with relevant expertise may be consulted to ensure a thorough and fair investigation.

### **6. Updates and confidentiality**

The Whistleblower will be kept informed of the progress of the investigation and the likely timescales. However, they may not receive detailed information about the investigation or any resulting actions, as confidentiality and legal obligations must be respected.

## 7. Escalation

Concerns will be addressed fairly and appropriately. If the Whistleblower is dissatisfied with how the investigation has been conducted, they may escalate the matter to the Board of Trustees of the GB Provincial Charity for further consideration.

If the Whistleblower feels unable to raise concerns through the above channels, they may approach any individual Trustee. Trustee details are available via the Charity Commission's register.

If the Whistleblower remains unsure about the appropriate route, or is dissatisfied with the final outcome, they may seek advice or raise concerns with an external body such as:

### **Safeguarding-Specific Bodies:**

- **Religious Life Safeguarding Service (RLSS)** for safeguarding concerns involving religious institutes or where specialist safeguarding oversight is required.
- **The Diocesan Safeguarding Team** (as appropriate) for advice, escalation, or reporting safeguarding concerns where diocesan oversight or coordination is appropriate.

### **Regulatory and Oversight Bodies:**

- **The Charity Commission** for concerns about governance, misuse of charitable funds, serious incidents, or failure to comply with charity law.
- **Fundraising Regulator** for concerns relating to fundraising practice, transparency, or compliance with fundraising standards.

### **Statutory Health, Safety, and Welfare Bodies:**

- **Local Authority Social Care / Local Authority Designated Officer (LADO)** for concerns that a child or adult at risk may be suffering, or is likely to suffer, harm, or where an allegation is made against someone who works with children. This includes referrals to Children's or Adult Social Care and notifications to the LADO where a person in a position of trust may pose a risk.
- **Health and Safety Executive (HSE)** for concerns about unsafe environments, serious health and safety breaches, or risks to staff, volunteers, or the public.

### **Independent Advice and Support:**

- **Citizens Advice** for impartial guidance on rights, responsibilities, and appropriate escalation routes.

### **Law Enforcement:**

- **The police** where criminal activity is suspected or where immediate risk or harm is present.

## **FALSE OR MALICIOUS ALLEGATIONS**

While the Whistleblower is not expected to provide absolute proof, they must be able to explain the basis of their concern. Most concerns are raised in good faith; however, deliberately false or malicious allegations are unacceptable and may result in disciplinary action, including dismissal for gross misconduct.

## **CONFIDENTIALITY COMMITMENTS**

The GB Province will make every reasonable effort to keep a Whistleblower's identity confidential when requested. However, confidentiality cannot be guaranteed in all circumstances. We may be required to disclose a Whistleblower's identity to:

- the police, or other statutory investigative agency (for the investigation or prevention of crime, including fraud)
- the courts (as part of legal proceedings)
- any person to whom GB Province is legally obliged to disclose information

Where disclosure is necessary, GB Province will inform the Whistleblower at the earliest opportunity. To protect the integrity of the process, we ask the Whistleblower not to discuss the matter outside of the investigation.

## **PROTECTION FOR WHISTLEBLOWERS**

If you raise a genuine concern, The GB Province will support you, even if no breach is found. If you believe you have been treated unfairly because you raised a concern, report this immediately to the Provincial, and if unresolved, to a Trustee. Independent advice is available from Protect: [www.protect-advice.org.uk](http://www.protect-advice.org.uk), 020 3117 2520.