



Expressing Concerns and ‘Whistleblowing’: Policy and Guidance

Introduction

“The pattern of living that is revealed through Jesus in his relationships with others means that abuse of any kind is emphatically contrary to the will of God and an affront to human dignity. This places a heavy responsibility upon the Church and its members to do everything possible to prevent or halt it.” - Responding Well to Domestic Abuse 2017, (section 1.2, pg. 8)

The above statement is held true by us all committing to the premise that Safeguarding is everyone’s responsibility: given this, encouraging people to express concerns appropriately and in a timely fashion is an important aspect of a strong safeguarding culture. Additionally, ‘whistleblowing’ has been recognised as having an important place in developing a strong safeguarding culture within organisations. At the simplest level, anyone can spot a genuine concern. At a more fundamental level, organisations – including the church – can become hierarchical and opaque, and a strong whistleblowing policy recognises the importance of authorising 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 diocesan office, parish, church, benefice or church project within the Diocese of Lincoln to raise genuine concerns regarding poor practice that impacts upon the safety or wellbeing of all those to whom they seek to minister within local parishes, church led projects or through the diocesan office. This whistle blowing policy also aims to ensure that any concerns are dealt with effectively and in a timely fashion.

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.

The policy and guidance applies to everyone involved in the diocesan office and parishes, churches and benefices in the Diocese of Lincoln, and all workers who are involved in either a paid or voluntary basis.

Like all safeguarding policies, this policy should be easily available for all – for instance at the back of church and on the church and diocesan 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:

- The diocesan office and each parish, church, benefice or church project within the Diocese of Lincoln recognises that safeguarding is everyone’s responsibility
- The diocesan office, and each parish, church, benefice or church project within the Diocese of Lincoln recognises that no other concern or responsibility, however genuine, outweighs the need to prioritise the welfare of children or of adults at risk of abuse, at all times

- The diocesan office and each parish, church, benefice or church project within the Diocese of Lincoln welcomes, encourages and urges anyone who is concerned about any aspect of our safeguarding practice or provision to raise those concerns, as outlined in the Guidance below.
- The Diocesan office and each parish, church, benefice or church project within the Diocese of Lincoln welcomes, encourages and urges anyone who is concerned about any safety and welfare of a child or adult to report those concerns as outlined in the Guidance below, and in accordance with the Guidance found in the section of the Diocesan Website, entitled ‘What if.....’
- The diocesan office and each parish, church, benefice or church project within the Diocese of Lincoln undertakes to treat all such concerns seriously, as outlined in the Guidance below
- The diocesan office and each parish, church, benefice or church project within the Diocese of Lincoln guarantees 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 school, speak to the Sunday School leader). A good principle is that concerns should be dealt with at the lowest level necessary, and only escalated beyond that if those concerns remain, having been expressed. However, if your concern is about the behaviour of 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 and 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 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 C, 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 below guidance 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. Children’s Work Leader)**
 2. **Incumbent (and/or churchwarden in vacancy)**
 3. **Diocesan Safeguarding Team**
 4. **Diocesan Bishop**
 5. **National Safeguarding Team**
- In escalating your concern you are acting in an entirely appropriate way. Safeguarding 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 children and adults 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 child or adult), then you must raise those concerns without delay with the appropriate statutory authority. Details of who to contact can be found on the diocesan website at <http://www.lincoln.anglican.org/safeguarding>

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 not to tell anyone else: you do not know what they are going to share, but if they share an immediate safeguarding concern you will have no choice other than to break that promise. You can promise to treat the information confidentially but explain that within safeguarding terms this means you will have to pass information on but only the relevant pieces of information regarding risk of harm. You will only pass information to those with responsibility for taking action. This means that you do not have to work through your normal line management structure to raise a safeguarding concern.
- 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 to be acting in good faith.
- You may wish to suggest sources 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), or they may wish to speak to someone in the Diocesan Safeguarding Team.
- 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 have 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 if you have made no progress – hearing from you with no news is better than not hearing from you at all.
- Unless the concern is easily resolved, we suggest that you seek advice from the Diocesan Safeguarding Team.
- 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.