

Whistleblowing Policy

England and Scotland Community

1. Introduction

The Religious Sisters of Charity in England and Scotland (hereafter “the Congregation”) is committed to the highest integrity, accountability, and safeguarding standards in all ministry and operations . In alignment with the Catholic Safeguarding Standards Agency (CSSA) framework and the safeguarding policies of the Catholic Church in England and Wales, The RSoC strives to foster an open and transparent culture where concerns about wrongdoing or poor practice can be raised without fear. This Whistleblowing Policy is intended to encourage and enable anyone with a serious concern to come forward and voice that concern, confident that it will be addressed appropriately and that they will be protected from reprisal

This policy forms part of the broader safeguarding and governance arrangements and should be read alongside our Safeguarding Policy. It reflects the Public Interest Disclosure Act 1998 (PIDA), other relevant UK legislation, and Catholic Church norms to ensure that individuals who “blow the whistle” in the public interest are supported and protected. The Congregation will not tolerate any form of victimisation or retaliation against a whistleblower and will take all appropriate action to protect those who raise concerns in good faith.

2. Purpose and Scope

Purpose: This policy aims to provide a clear process for reporting concerns about wrongdoing within the Congregation or associated activities and to reassure whistleblowers that raising such concerns is safe and acceptable.

This policy aims to:

- Encourage and empower all personnel and stakeholders to report suspected wrongdoing or dangers at work (including safeguarding risks) at the earliest opportunity, in the right way, and without fear of adverse consequences
- Outline how concerns will be received, escalated, and investigated, particularly where they relate to safeguarding matters, to ensure proper handling of whistleblowing reports.
- Protect whistleblowers from harassment, victimisation or any other detriment arising from their disclosure, provided it is in good faith and in the public interest .
- Integrating whistleblowing into our governance and safeguarding framework will promote accountability and learning, allowing us to learn from mistakes and address issues to prevent future harm.

Scope: This policy applies to all individuals engaged in or with the Religious Sisters of Charity in England and Wales. This includes:

- All Religious Sisters of Charity (the vowed religious Sisters).
- Employees and Contractors: all lay staff, consultants, contractors, and others employed by or working on behalf of the Congregation.
- Clergy and Volunteers: any clergy working with or alongside the Congregation's ministries and all volunteers (including trustees, advisers, or helpers).
- External stakeholders are any other person who performs a service for or with the Congregation or who is connected to our work—for example, partner organisations, agency workers, associates, or even parishioners who engage with our projects .

The above are collectively referred to in this document as “workers” or “personnel” for the Congregation. The policy covers concerns about wrongdoing within the Congregation's remit. While primarily focused on matters internal to the Religious Sisters of Charity, it can also extend to concerns about safeguarding or misconduct in a Catholic parish, school, or other organisation *if* those concerns come to our personnel's attention during their duties (In such cases, we will ensure the information is passed to the appropriate Church or statutory authority in accordance with national safeguarding protocols.)

Relationship to Other Policies: Whistleblowing is distinct from other procedures for grievances and complaints. It is not intended to replace:

- Child and Adult Safeguarding Allegations: Specific allegations of abuse or harm to a child or vulnerable adult should ordinarily be reported immediately via the Safeguarding Policy and procedures (and will be referred to statutory authorities as required) rather than through whistleblowing. However, if you feel that such a safeguarding concern is not being taken seriously or properly handled, you *should* escalate it using this Whistleblowing Policy so that it can be addressed .
- General complaints from external parties (e.g., service users or the public) may be handled under the Complaints Policy.
- Disciplinary or misconduct processes: If your concern is about someone else's conduct in the Congregation and does not fall under the definition of whistleblowing (see below), it may be dealt with via management action or other appropriate procedures.

If you are unsure whether this Whistleblowing Policy covers your concern, you should seek advice from the Designated Safeguarding Lead or the Provincial (see Section 6 below). Do not hesitate to raise a concern. We will guide you through the appropriate procedure if it is not the correct route.

3. Definition of Whistleblowing

Whistleblowing is the confidential disclosure of information about suspected wrongdoing or dangers at work. In practical terms, it means a person (often an employee or volunteer) raising concern about malpractice, illegal acts, or omissions by people within the organisation or those who carry out work for the organisation. Whistleblowing can be done internally (for example, reporting to management within the Congregation) or externally (for example, reporting to regulators or authorities), and it is distinct from ordinary reporting in that it involves matters of serious public interest.

For the purposes of this policy, whistleblowing covers (but is not limited to) disclosure of any of the following types of wrongdoing, whether actual or suspected:

- Criminal offences: e.g. fraud, theft, bribery or abuse of any person
- Failure to comply with a legal obligation, e.g. breaching safeguarding laws, charity law, health and safety regulations, or data protection requirements.
- Miscarriage of justice: information indicating a serious miscarriage of justice has occurred.
- Endangering health or safety: acts or omissions creating risk to the health or safety of any individual (for example, neglect of those in our care or unsafe working practices)
- Environmental damage: acts causing serious environmental damage (though less likely in our context; this is covered by whistleblowing law)
- Covering up wrongdoing: any deliberate attempt to conceal any of the above or to cover up serious misconduct.

Safeguarding Concerns: In a Church context, whistleblowing often relates to safeguarding. Any serious concerns about the welfare or safety of a child or adult at risk – for example, suspicions that abuse is occurring, that someone in authority is failing to respond to allegations, or that there are systemic failures in safeguarding practice – would fall under whistleblowing if normal channels for raising those issues have not been effective. This policy raises concerns about safeguarding practice within the Congregation or the wider Church. It is Church policy that all allegations of abuse are reported to statutory authorities; we fully uphold that commitment. If a safeguarding risk is not appropriately addressed, you must speak up – your information could prevent harm. (Any immediate risk should, of course, be reported immediately to the Police or Social Services; whistleblowing is an additional route to ensure accountability, and that proper follow-up occurs.)

4. Legal Framework and Principles

This policy takes into account and is designed to comply with the Public Interest Disclosure Act 1998 (PIDA), which amended the Employment Rights Act 1996. PIDA provides legal protection to workers who make certain disclosures of information in the public interest.

These are known as “protected disclosures” or “qualifying disclosures.” In law, a qualifying disclosure is made by a worker who reasonably believes that one of the categories of wrongdoing listed in Section 3 has been, is being, or is likely to be committed and that the disclosure is made in the public interest . Under PIDA, employees (and certain workers) who make a protected disclosure must not be subjected to any detriment, dismissal or victimisation by their employer. The Congregation recognises its legal duties under this Act. In accordance with the law and our own Gospel values, we make the following commitments:

- **No Retaliation:** Any person who raises a concern under this policy will be protected from harassment, victimisation or retaliation. The Religious Sisters of Charity will not tolerate any harassment or victimisation (including informal pressure or ostracism) against a whistleblower and will take appropriate action to safeguard anyone who raises a concern in good faith . Victimising a whistleblower or deterring whistleblowing is a serious disciplinary offence.
- **Good Faith and Public Interest:** Individuals should ideally make disclosures in good faith and with honest intentions. However, even if a disclosure made under this policy turns out to be mistaken, the whistleblower will still be protected under PIDA, provided they reasonably believed that the information was true and raised it in the public interest . We prefer you to raise a mistaken concern than to silence a real problem.
- **Fair Treatment of Volunteers and Clergy:** It is acknowledged that not everyone covered by this policy is an “employee” in law (for example, volunteers, religious Sisters, and clergy may not have employment contracts). Such individuals may not be covered to the fullest extent of PIDA’s legal protections. However, the Congregation commits to treating all individuals who raise concerns under this policy with the same spirit of protection afforded by PIDA . In other words, we will not permit any unfair treatment of a volunteer, Sister, or clergy member who raises a concern, and we will handle their report with the same level of confidentiality and seriousness as if they were legally protected.
- **Confidentiality:** If requested, the identity of a whistleblower will be kept confidential as far as possible. We recognise that whistleblowers may fear reprisal, so disclosures can be made confidentially. Section 6 of this policy details how we handle confidentiality and any limits to it.
- **No Immunity for Wrongdoing:** This policy protects those who raise concerns but does not shield individuals who may be involved in wrongdoing. However, that fact will be considered when someone self-reports something they were involved in. We focus on addressing issues, not punishing those who come forward.
- **Malicious or False Allegations:** If it is found that an individual has deliberately made a false accusation or raised a concern *maliciously* or for personal gain and without any reasonable basis, this will be treated as a serious disciplinary matter . (No action will be taken against someone who makes an allegation in good faith

which is not substantiated by an investigation . We understand the difference between an honest mistake and intentional misuse of this policy.)

These principles align with the CSSA safeguarding standards and the broader expectations of the Catholic Church that wrongdoing is addressed transparently and justly. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work, especially in a religious and charitable context, and be watchful for illegal or unethical conduct .

5. Safeguarding Concerns and Whistleblowing

The Religious Sisters of Charity are dedicated to safeguarding children and vulnerable adults. We recognise that safeguarding failures or abuse are among the most serious issues that may be disclosed via whistleblowing. In line with the Catholic Church's policies in England and Wales, any allegation of abuse will be reported to the statutory authorities without delay. This whistleblowing policy works in tandem with our Safeguarding Policy:

- If you have a direct safeguarding concern or allegation (for example, you witness abuse or someone discloses abuse by a Church worker), you should immediately report it under normal safeguarding procedures – typically to the Designated Safeguarding Lead (DSL) or deputy, who will then inform the statutory authorities (Police/Local Authority) as required. Whistleblowing is not intended to replace immediate reporting of risk.
- Whistleblowing comes into play if you feel that a safeguarding concern is not being addressed appropriately or there is a broader problem in our safeguarding practice. For instance, if you reported an incident and believe it was ignored or covered up, or if you suspect a fellow staff member or leader is deliberately not following safeguarding protocols, these are matters to raise under this Whistleblowing Policy so they can be investigated and corrected.
- Any whistleblowing disclosure that involves a safeguarding issue will be referred to the DSL for advice and action as part of the investigation process . The DSL (or, if the DSL is implicated, an alternative appropriate safeguarding professional) will ensure that any necessary protective measures are taken *immediately* – for example, making a report to police or social services or suspending an individual from duties pending investigation. Urgent actions to protect children or vulnerable adults will not be delayed pending an internal inquiry The Provincial will also be informed of such reports, and the Congregation will cooperate fully with external safeguarding investigations.
- The Safeguarding Lead will also liaise with the Catholic Safeguarding Standards Agency (CSSA) if the matter warrants external review or if advice is needed. The CSSA sets our standards and may be consulted in complex whistleblowing cases related to safeguarding. We will also inform the Charity Commission of a serious

incident if the nature of the disclosure meets their reporting criteria (for example, any serious or systemic abuse issue).

- This policy reinforces a duty to report. Withholding information about abuse or serious risk, can itself be misconduct. All personnel, especially those in positions of trust (clergy, religious, managers), are expected to respond to concerns with the utmost integrity and urgency. Whistleblowing provides an avenue to ensure accountability when normal processes fail.

By integrating whistleblowing with safeguarding, we underscore that protecting the vulnerable is paramount. Even if a concern turns out to be mistaken, raising it allows proper checks to be made. Silence and secrecy have no place in a safe environment. The Congregation is committed to a culture of speak-up safeguarding that is consistent with our mission and the CSSA's standards.

6. How to Raise a Concern (Reporting Procedure)

Do not hesitate to raise the concern if you have reason to believe something is wrong within the Congregation or related activities. We encourage an early and open approach. Early reporting is often crucial – it allows issues to be addressed before they worsen or cause more harm .

6.1 Preparing to Report

You may raise your whistleblowing concern verbally or in writing. You can do so by phone, person, or email/letter. While no specific format is required, it is often helpful to put your concerns in writing so that the details are clear (and to avoid misunderstanding). A written account is preferable because it makes the process more efficient and records the concerns . If you make a verbal report, you may be asked to confirm details in writing later if you can.

When reporting, please provide as much factual detail as possible. Include information such as:

- **Background and context** – the circumstances that led to your concern or how you became aware of the problem.
- **Dates, times, locations** – when and where the incidents or issues occurred, if applicable.
- **Individuals involved** – who is involved or aware of the issue (names and roles, if known).
- **Description of the concern** – what exactly you have observed or suspected, why it troubles you or how it breaches our standards/policies.

You do not need absolute proof of wrongdoing to raise a concern. As a whistleblower, it is your responsibility to raise the concern honestly. It is the organisation's responsibility to

investigate and obtain evidence. So long as you have a genuine concern, it is better to voice it. Do not investigate the matter yourself – this could complicate an official investigation or jeopardise evidence. Simply report what you know.

6.2 Whom to Contact (Reporting Channels)

You should raise the concern with a person in authority within the Congregation. Choose whichever of the following you feel is appropriate in the circumstances, bearing in mind the nature of the issue and who may be involved:

- **Your Line Manager or Supervisor:** If you are an employee or volunteer working under a supervisor (for example, a project coordinator or local community superior), you may first consider raising the matter with them if you feel able to and they are not involved in the wrongdoing. They are required to take your concern seriously and escalate it as needed.
- **Designated Safeguarding Lead (DSL):** For any concerns involving safeguarding issues, or if you would prefer not to tell your immediate manager, you should contact the DSL. The DSL is the person appointed by the Congregation to lead on safeguarding matters and is trained to handle sensitive disclosures. Named DSL: The current DSL is [Name/Title] (contact details: [phone/email]). If the DSL is unavailable or implicated in the concern, you may contact the Deputy DSL or the Provincial directly.
- **The Community Leader:** The Community Leader (the leader of the Religious Sisters of Charity in England & Scotland) is responsible for safeguarding and overseeing this policy. You can report directly to the Provincial, especially if the concern involves senior figures, if you feel your concern has not been addressed at lower levels, or if you simply feel more comfortable doing so. The Provincial will ensure the matter is handled or assign an appropriate person to handle it on their behalf.
- **Other Named Contacts:** In some cases, you might prefer to speak with a trusted designated person, such as a Congregation's leadership team member or a Trustee (if the charity has a trustee board). The Congregation may also designate a specific Whistleblowing Officer or confidant (e.g. an independent safeguarding advisor or a safeguarding commission chair) as an alternative point of contact. (If such an officer is appointed, their contact details will be publicised to all staff/volunteers).
- **External (Regulatory) Contact:** We encourage internal reporting in the first instance. However, if you feel unable to raise the matter internally for good reason (for example, you believe the leadership of the Congregation is involved in the wrongdoing, or you fear a cover-up), you may consider reporting to an external authority. For safeguarding issues, you can contact the CSSA (Catholic Safeguarding

Standards Agency) for advice or to make a report about a Church body. You may also contact relevant “prescribed persons” outside the Church – for example, a *local authority designated officer (LADO)* for safeguarding concerns, the Charity Commission for concerns about mismanagement in a charity, the Health and Safety Executive for health/safety dangers, or the Police for any criminal matters. These regulators have their own whistleblowing processes and can receive disclosures. (Be aware that to retain PIDA protection when going outside, you should generally either have tried internal channels first or have a good reason to bypass them, and you must reasonably believe the information and that the external body is appropriate.)

When raising a concern, please state clearly that you are doing so under the Whistleblowing Policy (so the recipient understands to treat it as such) and say if you wish to remain confidential. It is fine to have an informal conversation initially but to trigger the protections and process of this policy, make it clear you are “blowing the whistle” on a serious concern.

6.3 Confidentiality and Anonymity

If you request that your identity be kept confidential, the Congregation will always respect this. Whistleblowing reports can be handled confidentially, meaning that while your identity might be known to the person you report to and those involved in investigating, it will not be disclosed to the subject of the complaint or unnecessarily further. We will not reveal your name or position without your permission unless we have a legal obligation to do so (for instance, if required by police in a criminal investigation or by a court), or it is impossible to investigate the issue without revealing your identity (e.g. if you are one of a very small number of people involved). We will discuss with you beforehand if disclosing your identity beyond the initial report-takers is necessary.

You should be aware that in some situations, your role or the nature of the report might indirectly reveal your identity (for example, if only one person is likely to know the information). We will work around this, but maintaining complete anonymity may not always be feasible while acting on the concern.

Anonymous reporting: We discourage anonymous reports because it is harder to investigate them effectively. Without the ability to contact you for further information or clarification, investigators might not be able to fully pursue the matter. It is also impossible to provide support or feedback if we don’t know who you are. Nonetheless, we understand that individuals might feel more secure making an anonymous tip in rare cases. Anonymous disclosures will be considered and investigated to the extent possible. However, remember that anonymity can hinder our ability to verify facts or ask follow-up questions, and it could impede legal or disciplinary action if evidence is limited. We therefore urge you to trust the confidentiality protections above and share your identity when making a report, at least to the designated recipient of your concern.

Whether you remain confidential or not, the Congregation will handle your report with sensitivity and care. You will not be required to prove your allegations, but you should have reasonable grounds and believe them to be true. Deliberately false or malicious reports are unacceptable (see Section 4, Malicious Allegations).

7. Response and Investigation Procedure

7.1 Initial Receipt of Concern

Once you have made a disclosure, the person receiving it (e.g. your manager, the DSL, or the Community Leader) will ensure that it is logged and promptly assessed.

They may do one or more of the following immediately:

- **Thank you and Clarify:** Acknowledge that they have received the concern, and clarify any initial points if something is unclear. They will also assure you of confidentiality as appropriate and reiterate that you are protected from reprisal.
- **Secure any urgent evidence:** If physical evidence (documents, emails) is at risk, steps may be taken to preserve it. You may be asked not to alert anyone else to the concern while an initial review is underway (to avoid tip-offs to a subject).
- **Notify the appropriate senior person:** The recipient will usually inform the Provincial (unless the Provincial is the subject of the allegations) that a whistleblowing report has been made, and, if not already involved, involve the Designated Safeguarding Lead if the matter relates to safeguarding. If the report were made to someone other than the Provincial or DSL, it would typically be escalated to them or another appropriate Trustee/leader for oversight. Extremely sensitive cases (e.g. allegations against the Provincial) may be handled by an external person or another senior religious leader outside the Congregation for impartiality.

7.2 Assessment and Investigation Planning

The congregation will consider your provided information and decide on the appropriate course of action. This may involve a brief initial inquiry or fact-finding exercise to determine if a full investigation is warranted and what form it should take. For example, some issues may be resolved by obtaining further information or a simple management action, while others clearly require a formal investigation.

Possible next steps include, but are not limited to:

- **Internal investigation:** appointing an investigator or investigative team (which could be an internal senior person with no conflict of interest or an external independent investigator if appropriate) to look into the matter thoroughly.

- **Referral to statutory authorities:** if the concern involves alleged criminal conduct, abuse, or an imminent risk to persons, the matter will be referred to the police, social services, or other relevant law enforcement/regulatory bodies without delay . (In many safeguarding-related cases, this happens as a first step rather than after an internal process, which aligns with our duty to report.)
- **Safeguarding procedures:** as noted, if the concern falls under established safeguarding allegation management processes, it will be handled according to those protocols (for instance, the CSSA “Responding to Allegations or Concerns” procedure) instead or in addition .
- **Employment or HR process:** If the concern points to misconduct by an employee (such as bullying, harassment, or a policy breach), it may be addressed through the disciplinary process. If it concerns a volunteer or Sister, a similar process of inquiry and action will be taken as per our internal policies for misconduct.
- **Referral under Canon Law:** In some cases involving clergy or religious, the issue may also be considered under the Canon Law of the Catholic Church (for example, a Sister's offence that has canonical implications could be referred to the appropriate Church authority). This would usually be in parallel with civil law actions, not instead of them .
- **Notify Insurers or Charity Commission:** if the nature of the concern triggers insurance notification duties (e.g. a serious incident that could lead to a claim) or falls under Charity Commission serious incident reporting criteria (e.g. abuse or serious harm, fraud, etc.), the Provincial or Trustees will ensure the relevant notifications are made .

In some cases, particularly where the information is insufficient or the matter falls outside our remit, the Congregation may decide not to proceed with a full investigation. If so, we will inform you of the reasons and advise on other steps you might take (for example, if it is a matter for another organisation).

7.3 Conducting the Investigation

If a formal investigation is initiated, it will be carried out promptly, fairly, and impartially. The investigator will usually develop terms of reference or an investigation plan, and will interview relevant witnesses, review documents, and gather evidence as needed. You (the whistleblower) may be interviewed or asked to provide a detailed statement to ensure the investigator fully understands your disclosure. You have the right to be accompanied by a friend or adviser (for instance, another trusted person from the Congregation) in any investigatory meeting if you wish, for support.

The Congregation understands the need for sensitivity during investigations. Investigations will be conducted with discretion, and information will only be shared on a need-to-know basis. Those accused of wrongdoing will generally be allowed to respond to allegations

against them. Still, not necessarily informed of who made the disclosure – the focus will be on the facts of what occurred. In some cases, the police or external authorities may lead the investigation (especially in criminal matters or safeguarding cases), and the Congregation will defer to them, providing full cooperation.

During the investigation, the whistleblower's role is typically to provide information if needed. You should refrain from investigating on your own. We will handle the process and keep you updated.

7.4 Outcome and Feedback

After any investigation or action, the Congregation will decide what further steps (if any) are necessary. This might include disciplinary action against wrongdoers, changes to policies or procedures, training or awareness measures, or referral to external bodies for further action.

As the whistleblower, you will be informed broadly of the outcome of your disclosure to the best of your ability. Because of confidentiality, you might not be given full details of investigatory findings or any disciplinary action taken (for example, if it involves someone else's personal data). However, the Congregation recognises that you need assurance that the matter has been properly addressed, so we will tell you whether your allegations were substantiated and what general action is being taken to resolve the issue. Please note that in some cases, the outcome may be that no action was justified or that issues have been addressed by managerial intervention; regardless, you will receive an explanation.

If, for some reason, there is a significant delay in concluding the investigation, we will inform you of this and (as appropriate) the likely timeframe for completion. Whistleblowers are encouraged to ask for updates or raise concerns about the progress with the person handling the case or the Provincial.

7.5 Escalation if Not Satisfied

We intend whistleblowing concerns to be handled properly and fairly within the congregation. If, however, you (as the whistleblower) are not satisfied with the outcome or handling of your concern, you have the right to escalate the matter. First, you should raise your dissatisfaction with the Provincial if you have not already done so. The Provincial will review whether the process was followed and consider whether further action is appropriate, such as reviewing the investigation or obtaining an independent opinion.

If you remain dissatisfied after internal escalation – or if the concern is so serious that you feel it cannot be addressed internally – you may consider contacting an external authority as described in 6.2 above. When doing so, explaining that you have already used the internal whistleblowing procedure and why you believe the issue remains unresolved is advisable. External bodies (such as the Charity Commission or another regulator) may decide to investigate the matter independently. The CSSA can also be informed if the issue pertains to

safeguarding or the conduct of Church personnel, and they may have oversight or audit functions to ensure proper practice.

We strongly encourage whistleblowers to utilise these channels rather than remain silent. The law and this policy protect your right to pursue a concern further if you genuinely believe it has not been addressed.

8. Protection and Support for Whistleblowers

The Congregation is committed to ensuring that anyone who raises a genuine concern under this policy is protected and supported throughout the process. In addition to the no-retaliation assurances in Section 4, the following measures are in place:

- **Protection from Detriment:** “Detriment” means any unfavourable treatment, such as dismissal, disciplinary action, threats, harassment, unwarranted transfers, or ostracism in the workplace. None of this will be tolerated against someone for raising a whistleblowing concern. If you believe you are experiencing any form of reprisal or pressure from colleagues due to your whistleblowing, report this immediately to the Provincial or DSL. It will be treated as a separate disciplinary matter. UK law (PIDA) gives employees the right to take legal action if they suffer detriment for whistleblowing; beyond that, as a Congregation, we consider it morally reprehensible to punish someone for speaking up. Regardless of rank, any person in our organisation who retaliates against a whistleblower will face disciplinary consequences.
- **Confidentiality of Whistleblower Identity:** As noted, we will do everything practicable to keep your identity confidential, if you wish, throughout the investigation and afterwards. In practice, only a few people who need to know will be aware of your identity. We also expect those involved in any subsequent proceedings to refrain from speculation or gossip that could identify a whistleblower. Breaches of confidentiality in this regard will be taken seriously.
- **Pastoral Support:** Raising concerns, especially about colleagues or within a close-knit religious community, can be stressful. The Congregation will offer pastoral care and support to whistleblowers. This might include regular check-ins to ensure you’re okay, access to counselling services if needed, or linking you with a support person (for example, a trusted Sister or friend) who can provide moral support. We want you to know you are not alone and that the organisation values your integrity.
- **Fair Treatment:** You will not be blamed or seen as causing trouble for reporting a genuine concern. On the contrary, the Congregation’s leadership affirms whistleblowers serve the community by enabling transparency. Your position in the organisation will not be compromised by raising a concern in good faith. For example, future references will not be negatively affected, and opportunities will not be denied based on whistleblowing. Continuing to fulfil your role to a high standard,

with the knowledge that you did the right thing, is something we will facilitate. If you face any difficulties, they can be addressed with the Provincial to ensure you are treated justly.

If You are the Subject of a Whistleblower: It's worth noting that being accused under a whistleblowing process can be challenging, too. The Congregation also has a duty of care to persons who are accused of wrongdoing to ensure they are treated fairly, and the investigation remains impartial. This is consistent with the principles of justice. Support will be provided to any individual who is subject to allegations without impeding the investigation. This maintains fairness and compassion on all sides.

In summary, we are committed to a safe environment for whistleblowing. This means an environment where everyone feels able to speak up and is confident that by doing so, they are contributing to the integrity and mission of the Church. As Pope Francis has emphasized the importance of accountability in the Church, we see whistleblowing as a positive element of our safeguarding and governance culture—one that ultimately helps protect the vulnerable and uphold the truth.

9. Roles and Responsibilities

The Community Leader of the Religious Sisters of Charity (England and Scotland) is responsible for this Whistleblowing Policy. The Community Leader ensures that the policy is implemented effectively, that all personnel know it, and that an appropriate culture of openness exists. The Provincial (or a delegated senior leader) will receive reports of concerns raised and is responsible for deciding on investigations and actions in serious cases. The Community Leader also has the duty to ensure that no one suffers retaliation for whistleblowing and that any required improvements identified through whistleblowing are carried out. When a concern implicates the Community Leader, the matter may be referred to the Congregational Leader (at the international level) or an appropriate independent authority to avoid any conflict of interest.

Designated Safeguarding Lead (DSL): The DSL is a key point of contact for concerns about children's or vulnerable adults' safety. The DSL's responsibilities under this policy include receiving and responding to whistleblowing reports that involve safeguarding issues, advising on immediate protective measures, and liaising with external agencies (police, social services, CSSA) as needed. The DSL will work closely with the Provincial during any investigation of a safeguarding-related concern and will ensure that the whistleblower's information is incorporated into the Congregation's safeguarding response. The DSL also helps train and remind all staff and volunteers that safeguarding concerns should be raised and whistleblowing is an available avenue if they are uncomfortable with normal reporting lines.

Safeguarding Commission/Trustees: (If applicable) The Congregation may have a Safeguarding Commission or a committee overseeing safeguarding and serious incident matters. That body has oversight of how safeguarding allegations and whistleblowing concerns are handled. They ensure that trends or repeated issues are addressed at a governance level. They may also receive anonymised reports of whistleblowing cases and outcomes to monitor the health of the organisational culture. A Trustee or external member may be designated as having special responsibility for whistleblowing (as a contact point or for oversight).

Managers and Community Leaders: All those in supervisory roles (e.g., project managers, local community superiors, heads of departments) are responsible for listening to and supporting any staff or volunteer who comes to them with a whistleblowing concern. They must take it seriously, ensure it's recorded, and escalate it according to this policy. Managers should also lead by example, fostering a culture where concerns are welcomed.

All Personnel (Staff, Sisters, Volunteers, Clergy): Every individual has a responsibility to consider the welfare of others and the integrity of our mission. If you see or suspect wrongdoing, you should not ignore it. All personnel are expected to familiarise themselves with this Whistleblowing and Safeguarding Policy and complete any training on these topics. Following the policy when raising concerns, you help ensure they can be dealt with effectively. Moreover, everyone must refrain from retaliating against or undermining a whistleblower – such behaviour will not be tolerated and is against our values of charity and justice.

10. Communication and Review of the Policy

Communication: This Whistleblowing Policy will be widely disseminated to ensure everyone is aware. It will be published in the Congregation's staff and community handbooks and available on official noticeboards and the website/intranet. New employees, volunteers, and sisters will be introduced to this policy during their induction. Periodic training or briefing will be provided (for example, through safeguarding training sessions) to reinforce understanding of how to raise concerns. The CSSA standard requires that the whistleblowing policy be readily available to all Church personnel; accordingly, we will ensure easy access and clear guidance.

Review: In consultation with the Safeguarding Lead and Trustees, the Provincial will review this policy at least every two years or sooner if there are changes in legislation or Church safeguarding standards that necessitate an update. The next scheduled review is [Month, Year]. Reviews will consider the effectiveness of the policy in practice, any feedback from those who have used it, and any updates in the CSSA framework or UK law (such as updates to PIDA or employment law). If improvements are identified, they will be incorporated. Any substantial changes to the policy will be approved by the Congregation's leadership and communicated to all personnel.

Monitoring: The Congregation will keep a confidential record of whistleblowing reports and their outcomes (maintained by the Provincial or designated officer). This record will not contain unnecessary personal data but will track the types of issues raised and confirm that they were addressed. The purpose is to identify any patterns (e.g. recurring issues in a particular area) and to demonstrate that we respond to concerns. The existence and usage of the whistleblowing mechanism may also be subject to external audit or inspection by Church authorities or regulators to ensure we meet our governance and safeguarding obligations.

11. Conclusion

The Religious Sisters of Charity in England/ Scotland are dedicated to maintaining an environment of trust, integrity, and safety. This Whistleblowing Policy is a key part of that commitment. By speaking up when something is wrong, each person contributes to protecting the vulnerable, improving our ministries, and enhancing the credibility of the Church's mission. In the spirit of the Gospel and the values of our Foundress, we encourage openness and courage in addressing wrongdoing.

If you have any questions about this policy or are unsure whether and how to raise a concern, you can confidentially contact the Designated Safeguarding Lead or Provincial for guidance. Remember: raising a concern is a service to our community, an act of responsibility and care. Through vigilance and transparency, we will ensure that our Congregation remains a safe and loving environment for all we serve.

Approved by:

Community Leader Sr. Mary Teresa Clarke.

English / Scottish Community

Religious Sisters of Charity

Date: March 2025

Next Review: March 2026