



# Whistleblowing Policy

**Issue Date:** May 2023

**Review Date:** Q2 2024

**Policy Written By:** Faye Briffa, AshfieldHR Ltd

**Edited by:** R Gray, B Hofmeyr

**Date Approved and Adopted by Elders:** XXXX 2023

Registered charity: 1158254

**Whistleblowing Policy**

## Contents

1. Overview
2. Who is this policy for
3. What is whistleblowing
4. How to raise a whistleblowing concern
5. Confidentiality and Anonymity
6. How we protect whistle-blowers
7. Taking your concerns outside King's Church Guildford
8. References

# **Whistleblowing Policy**

## **1. Overview**

1.1 King's Church Guildford ("KCG") is committed to its mission of 'building God's church, with God's word for God's glory'. We want to honour the Lord in all we do. KCG is committed to achieving the highest possible standards of service and the highest possible ethical standards in all of its work.

1.2 Church life is based on trust and mutual respect. The aim of this policy is to encourage workers (paid and voluntary) who have serious concerns about any aspect of KCG work to voice those concerns.

1.3 This policy outlines what you should do if you suspect any aspect of KCG is putting you or others in danger, shows serious malpractice, illegal actions, wrongdoing or unacceptable behaviours or practices.

1.4 The Public Interest Disclosure Act 1998 (the "Act") protects workers who raise concerns from victimisation or harassment.

1.5 This policy aims to:

- ensure that an internal process is available to enable workers to raise serious concerns which would not meet the criteria for a complaint;

- encourage workers to feel confident in raising serious concerns at the earliest opportunity;
- provide avenues for workers to raise those concerns and receive feedback on any action taken;
- ensure that workers receive a response to their concerns; and
- reassure workers that they will be protected from reprisals, victimisation, harassment, discrimination or disadvantage if they have made any disclosure in good faith.

1.6 You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

1.7 Whilst all malpractice and acts of discrimination will be investigated, it is especially important that suspicions of abuse are immediately reported to the Safeguarding Co-ordinator and/or Deputy Safeguarding Co-Ordinator.

## **2. Who is this policy for?**

2.1 The Policy applies to everyone who currently carries out the work of KCG, whether paid or as a volunteer. This includes third party contractors, suppliers and service providers.

2.2 While voluntary roles are not included within the Act, KCG encourages volunteers to use this process with the relevant principles of protection applied to them.

2.3 If you are an employee, this policy does not form part of your employment contract and we may update it at any time.

2.4 If an employee's concern relates to their own treatment as an employee, they should raise it under our other policies.

2.5 If a beneficiary / someone receiving support from KCG has a concern about services provided, they should raise those concerns under our other policies.

## **3. What is whistleblowing?**

3.1 All organisations can occasionally be affected by conduct that is dangerous, against the law, or that breaches ethical or professional codes. If you have any

such concerns, we encourage you to report them immediately — this is called ‘whistleblowing’.

3.2 The wrongdoing you disclose must be in the public interest. This means it must affect others, for example the general public.

3.3 The types of concerns you may want to raise with us by whistleblowing might include:

- A criminal offence
- The breach of a legal obligation
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Deliberate concealment of information related to any of the above.

This list is not exhaustive.

#### **4.How to raise a whistleblowing concern**

4.1 In most cases, you should start by raising your concerns with the Pastor either face-to-face or in writing.

4.2 If you would prefer not to go to the Pastor or if you have concerns or complaints about the Pastor, you should contact Richard Gray, one of the Elders.

4.3 If you would prefer not to go to the Elder set out in clause 4.2 you should contact one of the other Elders.

4.4 When writing, you should state that you are raising your concerns under this policy and then explain what those concerns are. Include all the key facts, dates, and the names of the people involved.

4.4 Where appropriate, the matters raised may be:

- investigated by the Pastor/Elder;
- referred to the police ;
- referred to a financial external auditor ;
- referred and put through established child protection/abuse procedures ; and/or
- subject of an independent inquiry.

4.5 Within ten working days of a concern being raised, the person contacted initially, will write to the worker:

- acknowledging that the concern has been received;
- indicating how KCG proposes to deal with the matter; and
- informing the worker of whether further investigations will take place and if not, why not.

4.6 You may be invited to a meeting to discuss your concerns, and you may be accompanied at this and any subsequent meetings by a colleague, friend or church member. If you bring a companion, we ask that you both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.

4.7 After the initial meeting, we will investigate your concerns and we may ask you to attend further meetings. To investigate properly, we may involve specialists with particular knowledge or experience of the issues you have raised.

4.8 We will keep you informed in general terms about how our investigation is progressing and how long it is likely to take. We may not be able to give you details about the investigation (or any action it leads to) as we need to protect confidentiality and comply with legal obligations. We understand this may be frustrating, and so we will do our best to reassure you that things are in hand and to explain why we are acting in the way we are.

4.9 Your concerns will be addressed fairly but we cannot guarantee the outcome of our investigations will be the one you want.

4.10 There is no right of appeal under this policy. If you remain dissatisfied, you may consider contacting the Charity Commission by which KCG is regulated via their website <https://www.gov.uk/complain-about-charity>

4.11 Most concerns are raised with good intentions but occasionally someone makes a false allegation out of malice or because they believe they have something to gain. Any employee found doing this will face discipline and is at risk of being dismissed for gross misconduct. Similarly, a volunteer can face disciplinary action.

## **5. Confidentiality and anonymity**

5.1 There is a significant difference between wanting to keep your concerns confidential and making a disclosure anonymously. We actively discourage anonymous whistleblowing. Concerns raised anonymously are very difficult, and sometimes impossible, to investigate. We can't properly establish whether allegations are credible without being able to ask you for more details or for clarification, and this makes it hard to reach an informed decision. This is why we urge you not to report matters anonymously.

5.2 If you do not feel comfortable in reporting your concern openly, tell us and we will do all we can to protect your identity. We may want to disclose your identity to people involved in the investigation, but we will always discuss this with you first.

5.3 You are protected from reprisals under this policy, but if you are still worried, talk to us. We will explore how far we can go in keeping your concerns confidential.

## **6. How we protect whistleblowers**

6.1 If you raise a genuine concern under this policy, we will support you fully even if we find through our investigations that you made a mistake or that there has been no breach of policy, legal obligation or other activity set out in paragraph 3.2.

6.2 We are aware that raising, receiving or investigating a concern can be a stressful and difficult time. We will offer and provide pastoral care to support you. Where needed we will endeavour to attain repair and reconciliation for the parties involved.

6.3 However, if you feel you have been treated badly as a result of raising a concern, you must tell us straightaway. First inform one of the Elders and, if the matter remains unresolved, you must follow a formal process.

6.4 All whistleblowers are given the same protection, so you must not threaten or otherwise badly treat others who have raised concerns under this policy. If you do, you may face disciplinary action. This could include dismissal for gross misconduct if you are an employee. The whistleblower may also be able to bring legal action against you.

6.5 You can get further advice on whistleblowing, protecting confidentiality and being protected from reprisals, via *Protect*, an independent charity. Their contact details are; [www.protect-advice.org.uk](http://www.protect-advice.org.uk) / 0203 117 2520.

## **7. Taking your concerns outside KCG**

7.1 This policy outlines the process for raising, investigating, and resolving wrongdoing within KCG. In exceptional / rare circumstances, you may need to go to an external body — an industry regulator, for example. The independent charity *Protect* (contact details in paragraph 6.5) can direct you towards the appropriate regulator for the type of issue you want to raise.

7.2 This policy covers the actions of third parties such as suppliers, service providers, and contractors, as well as our staff and volunteers. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. The Pastor/Elders will be able to explain how you should proceed.

7.3 Alerting the media to a concern — particularly before or during an internal investigation — is almost never justified or appropriate in any situation. We strongly discourage you from doing so, and will treat any contact with the press as a serious disciplinary issue justifying dismissal unless exceptional circumstances exist. We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator, and to have taken full advice from a lawyer or from *Protect* before being justified in approaching the press.

### **Contact details:**

Pastor – our new Pastor starts in summer 2023

Richard Gray – Elder – [richard.gray@kcg.org.uk](mailto:richard.gray@kcg.org.uk)

King's Church Guildford

[www.kcg.org.uk](http://www.kcg.org.uk)

Registered charity: 1158254