

Whistleblower Protection Policy

1. Purpose

At King's Church Edinburgh, we are committed to being a welcoming, caring and safe community. We know that things can go wrong in any organisation, and we take any concerns about unethical or harmful behaviour very seriously. This policy is designed to create a fair and supportive environment for all, protecting those who raise concerns (whistleblowers) and ensuring that any individual facing allegations is treated fairly and with respect.

2. Scope

“Whistleblowing” is defined by the [UK government website](#) as reporting “certain types of wrongdoing [that are] in the public interest”. Wrongdoing can include criminal offences, someone’s health and safety being in danger, a risk or actual damage to the environment, a miscarriage of justice, the church breaking the law, or the covering-up of wrongdoing.

Our whistleblowing policy applies to employees, volunteers, and anyone involved in the life of the church. It includes those raising concerns and those who have allegations raised against them. Whilst British law protects workers specifically (under the Public Interest Disclosure Act 1998) our aim is treat all allegations seriously and provide good pastoral care for anyone involved in an allegation, regardless of their role in King’s.

Personal grievances are not covered by whistleblowing law or this policy.

Safeguarding concerns should be reported using our Safeguarding Policy to our Safeguarding Officer, Karis Cookman, whose email address is karis@kingschurchedinburgh.org.

3. Definitions

- Whistleblower: Any person who reports concerns about unethical, illegal, or harmful practices within the church.
- Allegation: A claim made regarding unethical, illegal, or harmful practices or behavior that requires investigation.
- Investigation: A fair and thorough review of the facts surrounding an allegation to determine its validity and the appropriate course of action.
- Retaliation: Any form of retribution or unfair treatment toward a person who has raised a concern, or toward anyone involved in an investigation process.

4. Commitment to Non-Retaliation

We are committed to ensuring that no one who raises a concern will face retaliation, discrimination, or any form of mistreatment. Retaliation can include:

- Harassment or bullying.
- Changes in roles or responsibilities as punishment.
- Exclusion from church activities or leadership opportunities.
- Any other unjust treatment.

5. Protection of Whistleblowers

The policy will protect any whistleblower in the following ways:

- Confidentiality: We will make every effort to protect the identity of those who come forward to report concerns. We will only share information when necessary for the investigation or if required by law.
- Anonymity: If preferred, individuals may report their concerns anonymously. While this may limit our ability to follow up, we will take all reports seriously.
- No retaliation: Whistleblowers who raise concerns honestly and in good faith will not face any negative consequences. Retaliation against whistleblowers will not be tolerated and will be dealt with seriously.
- Support: We understand that a potential whistleblower could feel anxious or intimidated by the prospect of making an allegation, so we want to minimise these feelings by making the process as caring and simple as possible. Whistleblowers are also encouraged to seek support through church leaders, pastoral care, or counseling services if needed. They may wish to seek help from leaders in another local church or from a service such as [Premier Lifeline](#).
- Concerns in bad faith: It is always our working assumption that concerns are raised in good faith. However, if it is determined that a concern was raised not in good faith or with the intention of causing division or harm, the church will follow a process we see described in Matthew 18:15-17. This may include a recommendation of conversation between the parties involved and pastoral guidance, with the aim of reconciliation. The church leadership is committed to ensuring that unity, peace, and the well-being of the church body are upheld throughout the process.

6. Protection of Individuals with Allegations Against Them

Presumption of Innocence: Any individual who is the subject of an allegation will be treated with fairness and dignity. The church will presume innocence until a thorough investigation has been conducted.

Fair Process: Individuals accused will be given a full opportunity to respond to the concerns raised. The church will ensure the process is respectful, impartial, and transparent.

Temporary Reassignment: If necessary, the person accused may be temporarily reassigned or given leave during the investigation to avoid undue pressure or conflict.

Confidentiality: In compliance with UK law, the details of the investigation will be kept confidential to protect the privacy of all parties involved.

7. Reporting Allegations

Anyone can raise concerns or allegations through the following channels:

They should speak to one of the elders or a trustee in the first instance; these are available to listen, offer guidance, and take appropriate action.

The elders are:

- Dan Hudson (dan@kingschurchedinburgh.org)
- Luke Davydaitis (luke@kingschurchedinburgh.org)
- Chris Rawson (chris@kingschurchedinburgh.org)

The trustees are:

- Phil Capon (phil.capon@fastmail.co.uk)
- Joel Hancock (joel.m.h@gmail.com)
- Gemma Morton (gemmajhoney@gmail.com)
- Alistair Simpson (a.simpson@doctors.org.uk)

Anyone wanting to report an allegation should inform the elder/trustee that they are wanting to use the whistleblower policy and do so in writing. They can use the template included at the end of this document as a guide. A private meeting can also be requested but an agreed written record of the meeting's contents should be produced.

In cases where internal reporting isn't possible or appropriate, individuals may choose to report concerns to external authorities. The following regulatory bodies and authorities in Scotland can be contacted:

- If the concern involves a potential breach of charity law or governance, concerns may be raised with the [Scottish Charity Regulator](#).
- If the concern relates to the care or welfare of individuals, particularly in relation to any church-run services, the [Care Inspectorate](#) can be contacted.
- For concerns involving criminal activity, [the police](#) should be contacted.
- For concerns related to health and safety within church facilities or activities, the [Health and Safety Executive](#) may be contacted.
- If the concern involves discrimination or human rights violations, the [Equality and Human Rights Commission](#) may be contacted.

8. Investigation Process

Investigations will be led by a trusted and impartial individual or group, ensuring that both the whistleblower and the accused are treated fairly. We are committed to conducting a thorough, unbiased review of the situation.

We aim to resolve investigations promptly, balancing the need for fairness with the need for timely action.

Information related to the investigation will be kept confidential, and only those involved in the investigation process will have access to sensitive details.

9. Outcome and Follow-Up

Communication: Once an investigation is concluded, the church leadership will communicate the findings to the whistleblower and the accused individual, as appropriate, while maintaining confidentiality.

Corrective Action: If the allegations are upheld, the church will take appropriate action. This may include counseling, training, or disciplinary measures. The action will be consistent with the principles of fairness and restoration in line with our values.

Non-Retaliation Assurance: Whether the allegations are substantiated or not, all parties will be assured that no retaliatory actions will be taken against them.

Appeal process. If the person making the allegation is unhappy with how the concern is handled, they should communicate this to the church leadership and the person/people who conducted the investigation. They should contact the most relevant organisation listed in section 7 above.

Data retention. In accordance with best practice and the request of our insurers, King's will securely store written documentation relating to the allegation for 30 years.

10. Training and Awareness

We will provide training for employees, volunteers, and leadership on the importance of whistleblower protections, how to handle concerns respectfully, and the steps in the investigation process.

A version of this policy will be published on our church website so that everyone can know how to raise concerns and protect others in the church community.

More information about whistleblowing can be found on the [UK government's website](#), and from the whistleblowing charity, [Protect](#).

11. Review and Monitoring

This policy will be reviewed regularly to ensure it continues to meet the needs of the church and reflects good practice. Feedback from the congregation, leadership, and staff will be welcomed to help improve the process.

12. Legal Compliance

This policy is designed to comply with relevant UK laws, including those protecting whistleblowers. The church leadership is committed to ensuring all legal and ethical standards are met to support both whistleblowers and those involved in the investigation process.

Updated 10th June 2025

Acknowledgment

By signing below, you acknowledge that you have read, understood, and agree to abide by the King's Church Edinburgh Whistleblower Protection Policy. You understand your rights and responsibilities within the church community regarding reporting concerns and participating in investigations.

Chair of Trustees:

Lead Elder:

Template for raising a whistleblowing concern

Adapted from resource provided by [Protect](#).

This is only a guide. Please edit or adapt it to suit you.

Dear... [insert name of your line manager, a senior manager you trust, or details of a designated contact in the whistleblowing policy],

I am writing to you to raise a whistleblowing concern [in accordance with the company's whistleblowing policy].

My concern is as follows...

Here you should:

- **Raise what you have seen, or are personally aware of, and where possible stick to situations or incidents you have seen for yourself rather than what colleagues may have told you**
 - **Describe your concerns in detail but try to be specific and concise. Imagine you are the person receiving the concern: You want to include enough detail so that the person can understand and act on the concern, but not too much that they are overwhelmed. Remember they can always come back to you for more information if they need it.**
 - **If the concern relates to a particular incident, explain who was involved, and when and where it happened**
- **Give specific examples of wrongdoing of which you are personally aware. Try to be as clear as possible when explaining why you think this is wrongdoing**
- **If your concern shows any of the following (whether in the past, present or future) then expressly say this and explain why:**
 - **A danger to health and safety**
 - **Failure to comply with a legal obligation**
 - **A criminal offence**
 - **Damage to the environment**

- **A miscarriage of justice**
- **The concealment of any of the above.**
- **Explain why you think raising the concern is in the [public interest](#): set out the scale of the harm and the potential risks if the concern goes unaddressed.**

I am raising these concerns with you openly. I am happy for my identity to be revealed.

OR

I am raising these concerns with you on a confidential basis [in accordance with the company's assurance of confidentiality in the whistleblowing policy]. I do not want my identity to be revealed to any other party without first obtaining my consent. I ask that you investigate the concerns in such a way so as not to reveal my identity.

OR

I am raising these concerns with you anonymously. I do not want to reveal my identity to you. [Raising concerns anonymously can make it more difficult to assert your legal rights. See [here](#) for more information and [contact Protect](#) for advice if you are unsure].

I would be grateful if you could please acknowledge receipt of this letter, and provide a response within two weeks of what action you will take. Please let me know if you need me to clarify any of the above information. I am happy to attend a meeting to discuss these concerns.

Best wishes,

[Your name]