



## **KingsGate Whistleblowing Policy**

Review Date: August 2025  
Next Review Date: August 2026

## INTRODUCTION

The **Public Interest Disclosure Act 1998 (PIDA)** applies to all UK organisations and protects workers from dismissal or detriment when they raise genuine concerns in the public interest, known as whistleblowing.

PIDA encourages individuals to speak up about wrongdoing such as misconduct, malpractice, health and safety risks, safeguarding concerns, or criminal offences. It ensures that the focus remains on addressing the concern, rather than penalising the person who raised it.

Disclosures may be protected whether made internally or, in certain circumstances, to external bodies—provided the disclosure meets the legal requirements.

At KingsGate Church, we are committed to creating an open environment where staff, volunteers, and others feel confident to raise concerns without fear of reprisal.

We recognise the need to balance the right of individuals to speak out in the public interest; and the right of KingsGate Church and its members to be protected from false or malicious allegations.

Under this policy, a disclosure will be protected if the individual:

- Has a reasonable belief that the concern relates to wrongdoing covered by PIDA (e.g. criminal offence, legal breach, danger to health/safety, or deliberate concealment); and
- Believes the disclosure is in the public interest.

## DEFINITION

**Whistleblowing** refers to the reporting of suspected wrongdoing within the workplace by current or former workers. This may include concerns such as fraud, malpractice, mismanagement, breaches of health and safety law, or any other illegal or unethical activity.

Concerns may relate to the actions of management, trustees, staff, volunteers, contractors, or other individuals connected to the organisation.

For the purposes of this policy, the term “employee” is used broadly to include trustees, volunteers, contractors, and individuals from external agencies working with KingsGate Church.

## ABOUT THIS POLICY

This policy applies to all KingsGate Church employees, volunteers, trustees, and contractors.

This policy is separate from KingsGate’s grievance procedures. It should not be used to raise personal employment grievances.

### Examples of concerns covered:

- Conduct that breaches legal obligations
- Disclosure related to miscarriages of justice
- Actions endangering health and safety (including risks to children, vulnerable adults, or the public)
- Environmental damage
- Criminal offences
- Deliberate concealment of any of the above

All employees have a responsibility to report fraud, criminal offences, or safeguarding issues. It is always preferable to raise suspicions using this procedure rather than ignore them.

Concerns might also relate to:

- Actions that breach KingsGate Church policy
- Practices falling below expected standards
- Conduct that could be viewed as improper

## **CONFIDENTIALITY AND ANONYMITY**

All concerns will be treated in confidence, and every effort will be made not to reveal the identity of the whistleblower. However, complete confidentiality cannot always be guaranteed, especially if:

- Disclosure is required by law or regulatory authority
- Police or safeguarding bodies need to be informed

All parties involved in the investigation will be expected to maintain confidentiality throughout the process.

Anonymous allegations will be considered and investigated as far as reasonably possible. However, disclosures made with a name carry more weight and are easier to investigate.

## **PROTECTION FROM RETALIATION**

KingsGate Church does not tolerate harassment or victimisation of any kind. Whistleblowers will be treated as witnesses, not as complainants. Victimising someone who raises a genuine concern will be treated as a disciplinary offence.

However, making malicious or knowingly false allegations may result in disciplinary action.

## **EXTERNAL DISCLOSURE**

While KingsGate encourages internal reporting, there may be legitimate reasons to report externally, such as when:

- Senior leadership, i.e. Pastors, Elders etc. is implicated
- A serious health and safety issue exists
- There is evidence of discrimination or criminal wrongdoing

External bodies may include:

- Police
- Health and Safety Executive (HSE)
- HMRC
- National Audit Office (for public funding concerns)
- Care Quality Commission or other relevant regulators

Whistleblowers making external disclosures must:

- Reasonably believe the allegations are true
- Reasonably believe they will suffer detriment if they do not disclose
- Have raised the matter internally first, where appropriate
- Not make the disclosure for personal gain

Disclosures that involve confidential information must only be made if it is clearly in the public interest.

## **RESPONDING TO A CONCERN**

KingsGate Church will respond to all concerns. An investigation does not imply acceptance or rejection of a concern.

Possible outcomes include:

- Internal investigation by Elders, Pastors, or staff
- Investigation under another policy (e.g. Safeguarding)
- Referral to police or external authorities
- External audit or inspection
- Legal proceedings

Initial enquiries will determine if an investigation is appropriate and which procedure should apply.

## HOW TO RAISE A CONCERN

You should raise your concern with an **Elder, the Safeguarding Officer, or a Pastor**. This can be done in writing or in person. You may request confidentiality.

If they believe your concern is genuine and falls under this policy, they will refer it to the **Senior Pastor**.

If the concern involves the Senior Pastor, contact the **Safeguarding Trustee**.

## INVESTIGATION PROCESS

The **Investigating Officer** (usually the Senior Pastor) will:

- Interview the individual privately within five working days (or immediately if safeguarding or safety is at risk)
- Collect relevant information and assess next steps
- Keep the whistleblower informed throughout
- Report the concern to the **Trustees**

A colleague, trade union representative, or support person may attend the interview.

**Within 10 working days, the Investigating Officer will recommend:**

- Internal investigation by KingsGate Church
- Referral to a relevant external body

**No further action may be taken if:**

- No evidence of wrongdoing is found
- The concern was not raised in good faith
- The matter has already been addressed through other procedures
- Legal proceedings are already underway

The whistleblower will receive a written outcome within **28 days**, sent to their home address. If no response is received in that time, they may appeal to the Trustees after informing the Investigating Officer.

At any time, the individual may seek **legal advice** in confidence.

KingsGate Church will ensure that whistleblowers are protected from any form of **victimisation or discrimination**.

## RECORDING, MONITORING AND EVALUATION

All concerns raised will be recorded and monitored. Where safeguarding concerns are raised, the **KingsGate Safeguarding Policy** will be followed.