



Stapleford Baptist Church is a Charitable Incorporated Organisation: charity number 117554

Stapleford Baptist Church Whistleblowing Policy

What is whistleblowing?

The following is a definition that appears in an FIEC document*

*It is a concern that **practices or procedures** in the church or charity places people at risk.*

***Whistleblowing** is the act of telling someone internal to the organisation or to the public that the organisation you work for either in a paid or voluntary capacity is doing something illegal, immoral, illicit, unsafe, or fraudulent, or out of line with the standards set in the governing documents. A whistle-blower is a person who comes forward and shares his/her knowledge on any wrongdoing which he/she thinks is happening in the whole organisation or in a specific department. A whistle-blower could be an employee, volunteer or a person accessing the organisation who becomes aware of the activities listed above.*

*Fellowship of Independent Evangelical Churches – to which SBC is affiliated.

What is not whistleblowing?

Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law. Nor are complaints, which relate to a claim that someone has been treated unfairly, unsatisfactorily, or inappropriately, or that they are dissatisfied in some way with their treatment – SBC has a Complaints Policy which should be followed.

How does SBC handle whistleblowing?

At SBC our whistleblowing policy is part of our Safeguarding policy. That reflects the fact that in many organisations whistleblowing has been a means of exposing incidents or policy or practice faults relating to the safeguarding of children or vulnerable adults. BUT, as mentioned in the first paragraph above, whistleblowing may be necessary to expose other issues which should be of concern at SBC.

Reporting: blowing the whistle

If there is a serious concern, it is important that this be reported and checked. Normally a report should be made to the elders, who are SBC's trustees, and they will investigate the concern and will take responsibility. If it is a Safeguarding concern, it should be raised with the Safeguarding Lead. The report will be treated as confidential although the outcome may need to be published, and in some cases a report may have to be made to the police or a statutory or agency – which may preclude some or all aspects of an internal investigation being made at the same time.

It is appreciated that some concerns are very serious, such that it may be necessary to bypass the trustees. Possible routes for reporting are:

- To the police for criminal matters



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- To Nottinghamshire County Council Social Services for safeguarding matters
- To FIEC if there is an allegation of spiritual abuse
- To the Charity Commission: SBC is a charity registered with the Charity Commission – its regulator. The Charity Commission has published guidance on making complaints. We have set out as an appendix to this policy an extract from the guidance current at the date of adoption of this policy. More details can be found on the Charity Commission web site.

*This Policy was adopted by the Trustees on
reviewed as necessary, and in any event not later than*

*2023 and will be
2025*

*Signed.....
(Chairman)*

Appendix to SBC Whistleblowing policy

Extract from Charity Commission advice on making a complaint about a charity.

What do I do if I have a complaint about a charity?

2.1 The short answer

In most cases you should speak to the charity about your concern before you make any approach to the Commission. You may want to raise an issue that the Commission would not wish to take up so it will be right for you to approach the trustees direct.

Some concerns may be very serious, and it might not be appropriate to speak to the trustees first, for instance, criminal activity in a charity should be reported immediately to the police and to the Commission without informing the charity first.

You do not need to tell the Commission about issues that you have discussed with a charity and about which you have had a satisfactory response.

In more detail

The trustees of a charity are responsible for the running of their charity, and it is fair and appropriate that you raise your concern with them first. It gives the trustees the opportunity to explain misunderstandings or to put things right if something has gone wrong.



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Issues that should be taken up with the trustees include:

- policies for running the charity or decisions taken by the trustees that are within their powers and within charity law
- instances of poor service from a charity
- employment issues, for example, unfair dismissal
- contractual disputes
- internal charity disputes where there are properly appointed trustees (see the guidance [Conflicts in a charity: statement of approach](#))

Therefore, in practical terms the Commission will not take forward complaints:

- where you disagree with decisions made by the trustees and those decisions have been properly made within the law and the provisions of the charity's governing document
- to resolve internal disagreements over a charity's policy or strategy because those involved are responsible for settling the issues themselves
- about incidents of poor service from a charity where there is no general risk to its services, its clients or its resources
- where the complaint arises from a charity dispute and there are properly appointed trustees whose responsibility it is to deal with the issues reported
- where the issue reported does not pose a serious risk to the charity, its assets or beneficiaries
- where the issue is being dealt with by, or is the responsibility of, another statutory or supervisory body
- where there is a disagreement about the terms or delivery of a contract
- where legal proceedings are being taken by another party against a charity, including those for the collection of debts (except in a few very rare cases where the Attorney General has specifically asked the Commission to do so)

If your complaint is about a dispute within a charity please use the guidance [Conflicts in a charity: statement of approach](#).

The Commission's involvement in looking at complaints is limited to issues that pose a serious risk of significant harm to a charity's beneficiaries, assets, services, or reputation. Section 2.2 explains what serious or significant issues are and what the Commission do about them.

2.2 What are serious issues and what will the Commission do about them?

The short answer

The Commission has identified the types of issues it considers as serious and that may pose a significant risk to a charity's beneficiaries, assets, services, or reputation



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in the guidance [Risk framework: Charity Commission](#). The framework also sets out any factors the Commission need to consider when assessing how serious the risks are and whether it is appropriate for action to be taken. Depending on circumstances the Commission may decide not to take further action. If it does not take action it will tell you why and keep a record of your report.

The Commission will inform you if it takes up a serious concern, but it will not give you details of how it handles its casework. It will notify you of the outcome when it has finished its case. Sometimes it can take a while before you hear from the Commission.

In more detail

The issues the Commission considers to be serious or significant and unacceptable for any charity, its trustees, employees, or agents to be engaged in are set out in the following list. The issues are not listed in any order of priority:

- significant financial loss to the charity
- serious harm to beneficiaries and in particular vulnerable beneficiaries
- misuse of a charity for terrorist purposes (including links with or support for terrorism, financial or otherwise, connections to proscribed organisations, misuse of a charity to foster extremism)
- serious criminality and/or illegal activity within or involving a charity (including fraud and money laundering)
- charities set up for an illegal or improper purpose
- charities deliberately being used for significant private advantage
- where a charity's independence is seriously called into question
- other significant non-compliance breaches of trust or abuses that otherwise impact significantly on public trust and confidence in the charity and charities generally.

Where there are allegations of criminal activity or concerns about taxation those issues will be investigated by the appropriate authorities, i.e., the police or HMRC. The Commission's role in such matters is restricted to considering whether there has been misconduct or mismanagement in the administration of the charity in allowing illegal activity or taxation irregularities to occur. There may also be a need for it to act to protect charity property. Section 2.4 looks at reporting criminal matters to the Commission and to other authorities such as the police.

It is important to provide evidence to support your concern; this is explained in [section 2.3](#). If there is no evidence to support a complaint or allegation the Commission may not take any further action.



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The Commission will not act on unsubstantiated allegations, rumour, or opinion - to do this and, as a result, disrupt the charity's work would be unfair to that charity, its activities and its users and beneficiaries.

This Policy and Procedure was adopted at the Elders Meeting of 11 May 2023
and will be reviewed ~~on~~ annually

Signed on behalf of the Elders:

DRWOLLS

[Signature]

[Elder/Trustee]

