



Whistleblowing Policy

Approved by the Kirk Session June 2026

Review every 3 years

1. Purpose and Scope

Hill Street Presbyterian Church (HSPC) is committed to openness, integrity, accountability, and the protection of all who participate in its life and work. Everyone connected with HSPC should feel able to raise concerns about wrongdoing without fear of victimisation or disadvantage.

This policy provides a clear procedure for raising concerns where there are reasonable grounds to believe that serious malpractice has occurred, is occurring, or is likely to occur. It applies to:

- Employees
- Office-bearers
- Volunteers
- Members and adherents of the congregation

For the purposes of this policy, all such individuals are referred to collectively as "individuals".

This policy is distinct from grievance, bullying/harassment, or disciplinary procedures, which address personal employment matters.

2. Definition of Whistleblowing

Whistleblowing is the disclosure of information that an individual reasonably believes shows wrongdoing, illegal activity, or serious misconduct within the congregation.

Employees who make disclosures in the public interest may be protected under the Public Interest Disclosure Act 1998.

3. Matters Covered by This Policy

A concern may be raised under this policy where an individual reasonably believes that one or more of the following is occurring or is likely to occur:

- A criminal offence (including fraud, financial malpractice, bribery)
- Failure to comply with a legal obligation

- A miscarriage of justice
- A breach of safeguarding duties involving children or vulnerable adults
- A serious health and safety risk
- Deliberate concealment or suppression of information relating to any of the above

Concerns about personal employment matters should be raised through the appropriate grievance or disciplinary procedures.

4. Safeguarding

Safeguarding concerns must be reported immediately to the Designated Person. This requirement overrides the normal reporting route due to statutory obligations.

If the concern relates to the Designated Person, it must be reported to the other Designated Person, Minister or Interim Moderator, as per HSPC Safeguarding Procedures.

5. Principles

All disclosures must be made:

- In good faith
- Without malice
- With a reasonable belief that the information disclosed is substantially true
- Without seeking personal gain

The congregation will take all reasonable steps to protect individuals from detriment, retaliation, or disadvantage as a result of raising a concern.

6. Reporting a Concern

6.1 Internal Reporting Routes

Concerns should normally be raised with:

1. The individual's line manager (for employees)
2. The Session Clerk (for members, volunteers, or where the line manager is implicated)
3. The Minister or Interim Moderator (if the concern relates to the Session Clerk)

Anyone receiving a disclosure must ensure that it is acted upon promptly and appropriately.

6.2 Anonymity

The congregation will make every effort to protect the identity of the individual raising the concern. However, anonymity cannot always be guaranteed if legal proceedings require disclosure.

7. How to Raise a Concern

Concerns may be raised verbally or in writing. Individuals are encouraged to provide:

- The background and history of the concern (including dates)
- The reason for believing the matter requires investigation
- Any supporting evidence available

Individuals are not required to prove the allegation but must demonstrate reasonable grounds for concern.

8. Acknowledgement and Initial Response

Within ten working days, the person receiving the disclosure will normally provide:

- Written acknowledgement of the concern
- An outline of how the matter will be handled
- An estimated timeframe for investigation
- Confirmation of any initial enquiries made
- Information about next steps

9. Investigation Process

If an investigation is required:

- The Session Clerk (or Minister/Interim Moderator) will appoint an appropriate investigator or investigation panel.
- Where leadership is implicated or independence cannot be assured, an external investigator (e.g., Presbytery, PCI safeguarding team, or independent consultant) may be appointed.
- The investigation will be thorough, fair, and proportionate to the concern raised.
- Individuals may be invited to attend meetings and may be accompanied by a colleague, union representative, or companion.
- Those accused of wrongdoing will be informed of the allegations and given an opportunity to respond.

The findings will be reported to the Kirk Session, which will determine the appropriate course of action. This may include:

- Referral to the police
- Referral to safeguarding authorities
- Referral to the Charity Commission
- Action under grievance, disciplinary, or safeguarding procedures
- No further action

If the decision is not to proceed, the individual who raised the concern will be informed of the reasons.

10. Escalation

If the individual is dissatisfied with the outcome, they may raise the matter with the Presbytery Clerk, who may take further action if appropriate.

11. External Disclosures

Individuals should normally use internal procedures first. However, if they remain concerned, they may contact a relevant prescribed body, such as:

- Police
- Social services
- Health and Safety Executive
- Charity Commission
- HMRC
- Other regulators listed at: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

Any external disclosure must:

- Be made in the public interest
- Be based on a reasonable belief in the truth of the allegations
- Not be made for personal gain

12. Contacting the Media

The media is not a prescribed body. Disclosing concerns to the media is prohibited and may constitute gross misconduct for employees.

13. Protection from Detriment

No individual will suffer dismissal, disciplinary action, loss of role, or any form of retaliation for raising a concern in good faith under this policy.

Retaliation by any person within the congregation will be treated as a serious disciplinary matter.

14. Record-Keeping

All whistleblowing concerns, investigations, and outcomes will be recorded securely and retained in accordance with data protection requirements.

15. Review of Policy

This policy will be reviewed regularly by the Kirk Session. Questions about its operation should be directed to the Session Clerk.