Binscombe Church

Complaints and Whistleblowing Policy & Procedures

1. Introduction

Binscombe Church seeks to honour Christ in all we do. We aim to cultivate a culture of openness, accountability, humility and integrity. We recognise that concerns, complaints and disclosures of wrongdoing may arise, and we are committed to responding to them with fairness, transparency, compassion and due process.

This policy explains:

- how concerns and complaints can be raised
- how whistleblowing disclosures can be made
- how the church will respond
- what protections are in place for those who raise issues
- how safeguarding concerns are handled separately

This policy applies to all staff, volunteers, church members, attendees, and anyone connected with the life of the church.

2. Key Definitions

2.1 Concern

An informal expression of unease or uncertainty about a situation, behaviour or decision that may require attention.

2.2 Complaint

An expression of dissatisfaction about the actions, decisions or conduct of a church leader, volunteer or member, or about how a church policy has been applied. Complaints seek a response or resolution through the church's internal process.

2.3 Whistleblowing

The disclosure of information that highlights serious wrongdoing, risk or misconduct that affects the wider church or public interest on a systemic level. Examples include:

- criminal activity
- fraud or financial misconduct
- abuse of power or spiritual abuse
- safeguarding failures
- health and safety risks
- discrimination or harassment
- breach of legal obligations
- covering up wrongdoing

Whistleblowing is distinct from personal complaints or grievances.

2.4 Safeguarding Concern

Any concern relating to the safety or welfare of a child or vulnerable adult. These must be reported immediately to the Designated Safeguarding Lead (DSL) or via safeguarding@binscombechurch.org.

3. Biblical Principles

Where appropriate, and especially between believers, concerns should first be addressed relationally and privately (Matthew 18:15–20).
Where an Elder may be at fault, Scripture calls for careful, impartial handling (1 Timothy 5:17–21).

These principles guide our posture, but they do not replace formal procedures where needed.

4. Scope of This Policy

This policy covers:

- concerns
- complaint

- whistleblowing disclosures
- ethical or behavioural concerns
- financial or governance concerns

Safeguarding matters are handled under the separate Safeguarding Policy.

5. Concerns Procedure

Informal Resolution of a concern

Wherever possible, concerns should be raised informally with the person involved or with an Elder.
The Elders may appoint a responsible person to meet with the complainant to explore the issue.

Possible outcomes:

- **Resolved** — agreement reached
- **Partially resolved** — some issues addressed
- **Unresolved** — no agreement

A brief written summary will be provided and stored securely by the trustees.

If unresolved, the complainant may follow the complaints procedure.

6. Complaints Procedure

Stage One: Formal Complaint and Investigation

6.2.1 Submitting a Complaint

If a concern has not yet been raised, consideration should be given to following the Concerns Procedure above.

A formal complaint must be submitted in writing to at least two Elders. If the complaint is about ALL Elders, it should be directed to the Whistleblowing Policy and Procedures later in this document.

A complaints form is provided (Appendix A).

6.2.2 Acknowledgement

The church will acknowledge the complaint in writing within **7 days**, confirming:

- the named contact person
- the next steps
- expected timeframes
- pastoral support available

6.2.3 Investigation

The Elders will appoint an investigator or investigation team. This may be an Elder or another suitable person.

The investigation will include:

- meeting with the complainant
- meeting with the person complained about
- gathering evidence
- taking written notes
- maintaining confidentiality

If delays occur, the complainant will receive a progress update.

6.2.4 Outcome

The written outcome will explain:

- how the complaint was investigated
- conclusions reached
- actions taken or recommended

Stage Two: Appeal

If dissatisfied with the Stage One process or outcome, the complainant may appeal in writing to the Trustees (Elders and Deacons) within **28 days**.

The Trustees will:

- review the process
- determine whether further investigation is required
- make a final decision
- notify the complainant

The Stage Two decision is final.

7. Whistleblowing Policy

7.1 Purpose

Whistleblowing protects the church and its people by enabling serious concerns to be raised safely and addressed appropriately.

7.2 Protection for Whistleblowers

Binscombe Church is committed to ensuring that:

- whistleblowers are treated fairly
- confidentiality is respected wherever possible
- no one is victimised for raising a concern in good faith
- retaliation or intimidation is a disciplinary matter

7.3 Legal Context (Public Interest Disclosure Act)

While Binscombe Church is not an employer in the same sense as large organisations, we affirm the principles of the Public Interest Disclosure Act (PIDA):

A disclosure is protected when the person reasonably believes it is:

- in the public interest, and

- relates to serious wrongdoing (e.g., criminal activity, legal breaches, health and safety risks, safeguarding failures, or concealment of wrongdoing)
- Contains specific facts rather than vague allegations and suspicions

Whistleblowers do not need to prove the allegation — reasonable belief is sufficient.

8. Whistleblowing Procedure

Stage One: Raising a Disclosure

A whistleblowing concern may be raised with:

- an Elder
- the Designated Safeguarding Lead (if safeguarding-related)
- the Trustees (if the concern involves Elders).

Anonymous disclosures will be considered, though they may limit the investigation.

If the concern cannot be raised with those listed above, the whistleblower should go straight to Stage Six of the Whistleblowing Procedure.

Stage Two: Assessment

The person receiving the disclosure will:

- determine whether it should be handled under safeguarding, complaints, or whistleblowing
- confirm this in writing to the whistleblower within seven days

Stage Three: Investigation

An investigator will be appointed. The investigation may include:

- Establishing an appropriate timeline
- written statements

- interviews
- review of documents
- consultation with external advisors where appropriate

The whistleblower will receive appropriate updates.

Stage Four: Outcome

A written outcome will be provided, explaining:

- findings
- actions taken
- any referrals made

Stage Five: Review of Inadequate Process

If the whistleblower believes the investigation was flawed, they may request a review by:

- the Trustees, or
- the FIEC (if the Trustees are conflicted)

Stage Six: External Reporting

If serious wrongdoing is identified, or if internal processes fail, concerns may be reported to:

- FIEC
- Charity Commission
- Police
- Action Fraud
- HMRC
- Protect (independent whistleblowing charity)

Whistleblowers retain the right to escalate externally if they reasonably believe internal processes are insufficient.

9. Conflict of Interest

No one may investigate or decide on a matter in which they have a conflict of interest. Where conflicts exist, alternative investigators will be appointed.

10. Confidentiality and Data Protection

Information will be handled sensitively and stored securely.
Confidentiality will be maintained except where disclosure is necessary:

- to protect someone at risk
- to comply with the law
- to conduct a fair investigation

11. Repeated or Vexatious Complaints

The church is not obliged to reinvestigate complaints already addressed unless new, material information is provided.

Appendix A: Sample Complaints Form

Binscombe Church Complaint Form

Your details

Name:

Address:

Phone:

Email:

If anyone else is involved in raising this complaint or are you raising the complaint on behalf of someone else, please give details:

About the complaint

Date(s):

Person(s) involved:

Complaint about: *(please clearly describe the nature of your complaint)*

Supporting information:

- *State the matter or name of the person who is the subject of the complaint.*
- *What happened, when and where.*
- *Provide the contact details or statements of any witnesses.*
- *If complaining about a decision, explain what the decision was about, when it was taken, and who made it.*
- *Explain what impact this decision has had, or you may fear will have, and upon whom.*
- *Provide any additional information that you believe would be helpful.*

Q1. Have you tried to resolve this matter informally? YES/NO

If YES, please move to Q2.

If NO, please explain briefly why you decided not to try to resolve the matter informally, then move to Q3.

Q2. If you tried to resolve this matter informally, what happened?

State who you dealt with, when and where, what information you provided to them, and what you felt was unsatisfactory about the outcome.

Q3. What actions are you wanting Binscombe Church to take and what outcomes are you seeking?

Whilst the trustees cannot promise to do what you ask, it would be helpful to understand what resolution you are seeking.

Please note: Binscombe Church will treat your data carefully and in accordance with the church's data protection policy. Binscombe Church cannot guarantee to keep the fact and details of your complaint confidential if it is necessary and proportionate to share your data to review and resolve your complaint.

Signature of complainant: **Date:**

Appendix B: Complaint Acknowledgement Letter Template

[Date]

Dear **[insert name]**,

Thank you for your letter to **[church or name of specific person]** dated **[insert date]**.

We are sorry that you have had to raise a complaint **[include a brief summary of complaint]**.

We review your complaint in accordance with our complaints policy **[insert link]**.

[Insert the name of the responsible person(s)] will be in touch with you within 7 days to begin a review of your complaint. This will confirm the next steps to be taken, expected timeframes and the pastoral support available to you.

We will treat the facts and content of your complaint carefully and in line with our data protection policy **[insert link to church data protection policy]**. However, on occasion Binscombe Church may need to make a public statement about the subject matter of the complaint or to report the matter to the statutory authorities and consequently Binscombe Church cannot guarantee to keep the fact of or details of your complaint confidential. Where this may be necessary, you will be kept informed.

You should maintain reasonable confidentiality as to the nature and content of your complaint, other than to seek professional advice if required, and now that you have submitted your complaint, you should avoid communicating with the person complained about while the matter is being reviewed.

If you have any further questions, please do not hesitate to contact **[insert name/email]** in writing.

Yours sincerely,

[Name and signature]