

## **Whistleblowing Policy for the Parish of St Simon Zelotes, Upper Chelsea, in the Diocese of London.**

*‘Nothing is covered up that will not be revealed, or hidden that will not be known. Therefore whatever you have said in the dark shall be heard in the light, and what you have whispered in private rooms shall be proclaimed on the housetops.’ (Luke 12:2-3, ESV.)*

### **1. Introduction**

1.1 The PCC of St Simon’s is committed to ensuring that all complaints of serious wrongdoing are heard and addressed in a fair, prompt, and just way. Everyone in the Church should feel that they have the right and the freedom to raise concerns about matters of practice or policy, and that such concerns will be heard justly. No-one should ever be victimised or punished for raising any concern in good faith.

1.2 This policy has been adopted to provide a mechanism for church members, members of staff, church officers, and third parties to raise concerns about matters not otherwise addressed by the PCC’s complaints, grievances, or safeguarding policies. **Whistleblowing is not the same as complaint. It is about raising concerns regarding malpractice or wrongdoing within the Church that would meet the definition of a ‘qualifying disclosure’ below.**

### **2. The law and a qualifying disclosure**

2.1 The Public Interest Disclosure Act 1998 (the ‘Act’) provides protection for workers who raise legitimate concerns about specified matters. These are called “qualifying disclosures”.

2.2 A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that either:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation;
- financial malpractice, fraud, or impropriety;
- other illegal behaviour or serious malpractice which cannot be raised under an alternative policy; or
- concealment of any of the above;

is being, has been, or is likely to be, committed.

2.3 It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient.

2.4 The worker has no responsibility for investigating the matter – it is the organisation’s responsibility to ensure that an investigation takes place.

2.5 A worker who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because he/she has made a disclosure.

### **3. Who does this policy apply to?**

3.1 This policy applies to all office holders, staff, and volunteers of the parish of St Simon’s.

3.2 Other individuals who—having had contact with the parish or its officers, staff, or volunteers—have any cause for concern that a qualifying disclosure after 2 above should be made are also encouraged to use it.

3.3 Whilst the Act does not afford the same legal protection to office holders, volunteers, or other stakeholders, the PCC is committed to offering such protection to all who use this policy.

#### 4. Which sorts of disclosures are not covered under this policy?

4.1 Any concerns relating to the safeguarding of children or vulnerable adults should be reported to the Parish Safeguarding Officer: Sue Badman [[safeguarding@ssz.org.uk](mailto:safeguarding@ssz.org.uk)]. Any safeguarding concerns involving a member of the clergy or another church officer should be reported to the Diocesan (Area) Safeguarding Officer: [sarah.dale@london.anglican.org](mailto:sarah.dale@london.anglican.org).

4.2 If your concern is that a child or a vulnerable adult is in imminent danger of harm, you should immediately contact the police on 999, before contacting the Officers named above. All safeguarding concerns will be dealt with in accordance with diocesan ([here](#)) and national ([here](#)) safeguarding policies.

4.3 A concern related to bullying or harassment should be addressed according to the diocesan Harassment and Bullying Policy ([here](#)).

4.4 Members of staff wishing to raise a complaint related to their contract or conditions of employment should raise a grievance under the PCC's grievance policy.

4.5 Concerns or complaints about staff members, volunteers or clergy that are not thought by the person concerned to be a qualifying disclosure should raise a complaint under the PCC's complaints policy.

4.5 A concern related to clergy conduct, or the conduct of a churchwarden or other office-holder, that the person concerned believes would be a qualifying disclosure, should be reported to the Archdeacon of Middlesex: Richard Frank [[archdeacon.middlesex@london.anglican.org](mailto:archdeacon.middlesex@london.anglican.org)]. In the case of clergy conduct, the archdeacon will consider whether the misconduct alleged is of a level requiring action under the Clergy Discipline Measure 2003.

4.6 Though not formally covered under this policy, the PCC expects—and within its power, will ensure—that all types of complaints in this section will be heard in a manner consonant with this policy; *i.e* confidentially, fairly, and without fear of recrimination.

#### 5. How will concerns be addressed?

5.1 If a person is concerned that malpractice or wrongdoing that would fit the category of a qualifying disclosure has taken place, they should contact a Churchwarden [Susan Wajih – [warden@ssz.org.uk](mailto:warden@ssz.org.uk)] or the Incumbent or most senior clergy person licensed to the parish [Mike Neville – [mike.neville@ssz.org.uk](mailto:mike.neville@ssz.org.uk)] If you feel unable to raise it with either the Churchwardens or the Incumbent, you should contact the Archdeacon.

5.2 The person to whom the concern is reported will normally be responsible for hearing it. Where that is inappropriate due to a conflict of interest, or not possible for another reason, they will nominate another church officer or PCC member to be responsible for addressing the concern. Said person will be the responsible person for the rest of the procedure.

5.3 In the first instance, the responsible person will assess whether the disclosure is a 'qualifying disclosure' or whether it would be more appropriately dealt with through another relevant policy or process.

5.4 The responsible person will then arrange a meeting with you as soon as possible to discuss your concern. You may bring a friend, colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

5.5 The responsible person may conduct such further investigation as is necessary to resolve the concern. This may involve speaking to the person or people you are concerned about.

5.6 We hope that whistleblowing concerns can be voiced openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

5.7 At the conclusion of their investigation the responsible person will write to you informing you of their conclusions.

5.7.1 If they have deemed action necessary, they should inform you of what will be done, and the expected timescale to address it.

5.7.2 If they have judged further action unnecessary, they should inform you of their reason(s) for that conclusion.

5.8 The responsible person will keep records of their investigation and conclusions. At the end of the process they will give their records to the PCC Secretary to be filed in accordance with the PCC's records policy.

5.9 If you are unsatisfied with how your concern has been addressed, you may write to the Lay Vice Chair of the PCC, Church Warden Ed Rose – [wardencvc@ssz.org.uk](mailto:wardencvc@ssz.org.uk). You should write to them within [14] days of receiving the letter spoken of in 5.5, above. They will reply to you within [14] days.

5.10 If at the conclusion of the above processes you still do not feel that your concern has been adequately addressed, you may write to the archdeacon: Richard Frank.

5.11 No action will be taken against a whistle-blower if the concern proves to be unfounded and was raised in good faith.

5.12 Any office-holder, staff member, or volunteer who threatens any sort of retaliation against a whistleblower may be subject to disciplinary action.

5.13 Malicious or otherwise vexatious complaints will be considered very seriously and may result in disciplinary action in the case of a paid employee or office holder.

5.14 You may wish to report your concerns to an external authority, such as a regulatory body. You may wish to take advice before reporting your concern to an external party.

5.14.1 A list of prescribed people and bodies for the purposes of whistleblowing can be found here: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>.

## **6. Who is responsible for this policy?**

6.1 The PCC are generally accountable for the operation of this policy. Any complaint that the policy is not being, or has not been, followed appropriately should be addressed to the Lay Vice Chair of the PCC – Church Warden Ed Rose.

6.2 The PCC will review this policy annually.

6.2 If the concern relates to a member of staff or a volunteer, the incumbent and churchwardens are responsible for ensuring that the complainant is not punished or discriminated against in any way.

6.3 If the concern relates to the incumbent, the archdeacon and the churchwardens are responsible for ensuring that the complainant is not punished or discriminated against in any way.

Signed: Mike Neville (Vicar)

Date: September 2025

Signed: Ed Rose (Lay Vice Chair, on behalf of PCC)

Date: September 2025