

Responsible Trustee	Date policy produced	Name of Policy Writer	Frequency of Review	Date reviewed on / by whom	
Secretary	January 2020	Tony Wilkes	Annually	January 2024	Tony Wilkes

## Whistle blower Protection Policy

Cambray Baptist Church (CBC) requires church leaders, volunteers, and employees (also see specifically the Employee’s Whistleblowing Policy) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of CBC must at all times practice honesty and integrity in fulfilling responsibilities, and comply with all applicable laws and regulations and policies and procedures of the church.

For purposes of the policy, the definition of misconduct, dishonesty, and fraud includes but is not limited to:

- Immoral or unbiblical activities
- Acts which are inconsistent with church policy
- Theft, misuse, or misappropriation of church assets
- Misstatements or irregularities in ministry or financial records and reporting
- Illegal activities
- Forgery or alteration of documents
- Any other form of fraud

### Reporting Responsibility

This Whistle blower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that CBC can address and correct inappropriate conduct and actions. It is the responsibility of all employees, volunteers, and members to report concerns about violations or suspected violations of law, policies, values, or regulations that govern the church’s operations to the **Nominated Individual** (See below).

### Nominated Individual

The Nominated Individual is the Church Secretary or, if there is a conflict of interest or the complaint is against the Church Secretary, one of the Elders. The Nominated Individual may in turn nominate another person from among the Elders or Deacons to lead the investigation, ensuring there is no conflict of interest. The Nominated Individual or their nominee will follow up the issue and if escalation is required, one of the WEBA Regional Ministers will be contacted as follows: if the issue concerns Safeguarding, the WEBA Safeguarding Lead will be contacted; for any other issue, the local Regional Minister will be contacted.

## **No Retaliation**

It is contrary to the values of CBC for anyone to retaliate against any employee, volunteer, or member who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation or principle governing the operations of CBC. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Additionally, no employee shall be adversely affected because they refuse to carry out a directive which the employee reasonably believes is unbiblical, constitutes fraud, or is a violation of UK law.

## **Harassment, Intimidation or Victimization**

Harassment, intimidation, or victimisation of the reporting individual for providing information in accordance with this policy by anyone affiliated with the church will not be tolerated. In addition, the provision of such information shall not in any way influence, positively or negatively, the carrying out of routine evaluation or disciplinary procedures by church leaders as stated in the church's employment policies.

## **Procedures**

### **Reporting Procedure**

CBC has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your Ministry Leader or Supervisor or you are not satisfied with their response, you are encouraged to speak with the Nominated Individual. Ministry and Team Leaders are required to promptly report complaints or concerns about suspected ethical and legal violations in writing to the Nominated Individual who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns directly to the Nominated Individual.

### **Investigation of Complaint**

The Nominated Individual or their nominee is responsible for ensuring that all complaints about unethical or illegal conduct are promptly investigated and resolved. Upon receipt of a complaint the Nominated Individual or their nominee will promptly advise in writing to the Trustees, and shall then determine whether an investigation is appropriate, the form it should take, and who if anyone else should be notified. The complainant will be informed that follow-up has or is occurring within two weeks after receipt of the complaint.

The Trustees shall receive a report on each complaint and a follow-up on the action taken.

### **Accounting and Auditing Matters**

The Nominated Individual or their nominee shall immediately notify the Treasurer (barring any conflict of interest) of any concerns or complaint regarding church or ministry accounting practices, internal controls or auditing. The Nominated Individual or their nominee shall work with the Finance Committee until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable and credible grounds for believing the information disclosed indicates a violation of the applicable biblical guideline, law, regulation, policy, practice, or procedure of the church. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious offence and could lead to church discipline.

## **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Individuals considering such a report should be advised that anonymity cannot be assured if an external investigation or criminal proceedings relating to the report occur.

## **Dissemination and Implementation of Policy**

This Policy shall be disseminated in writing to all affected constituencies. CBC shall adopt procedures for implementation of this Policy, which may include:

1. Documenting reported violations.
2. Working with legal counsel to review the reported violation and determine an appropriate response.
3. Requesting an outside auditor or lawyer investigate the complaint.
4. Keeping the church leadership and, where appropriate, the congregation informed of the progress of the investigation.
5. Interviewing employees and volunteers.
6. Requesting and reviewing relevant documents, phone, and electronic transmissions.
7. Preparing a written record of the reported violation and its disposition, to be retained in the permanent records of the church.