

St Paul's, Brighton

Expressing Concerns and 'Whistleblowing': Policy and Guidance

1.0 Introduction

Safeguarding is everyone's responsibility. Given this, encouraging people to express concerns appropriately and in a timely fashion is an important aspect of a strong safeguarding culture. Additionally, 'whistleblowing' has been recognised as having an important place in developing a strong safeguarding culture within organisations. At the most simple level, anyone can spot a genuine concern and it is important that everyone who does so feels safe and able to raise that concern. At a more fundamental level, organisations – including the church – can become hierarchical and opaque, and a strong whistleblowing policy can help to address this by recognising the importance of empowering those who may not hold positions of structural influence within the organisation to feel confident enough to speak out, should they believe poor practice to be present.

The aim of this policy and associated guidance is to provide a clear and transparent way for anyone involved in the St Paul's parish/benefice to raise genuine concerns regarding poor practice that may be impacting upon the safety or wellbeing of children or adults to whom we minister. It also aims to ensure that any concerns are dealt with effectively and in a timely fashion.

This policy and guidance provides a simple set of steps to deal with concerns, ensuring that people are not penalised for raising genuine concerns, even if those concerns appear to be unfounded. It applies to everyone involved in St Paul's, including all workers who are involved on either a paid or a voluntary basis. **Like all parish safeguarding policies, this policy should be easily available for all – for instance, displayed clearly at the back of church and on the church website. It should not be necessary for someone who wants to see this policy to ask a leader within the church to provide it.**

2.0 Our Commitment

St Paul's Church, Brighton:

- Recognises that safeguarding is everyone's responsibility.
- Recognises that no other concern or responsibility, however genuine, outweighs the need to prioritise the welfare of children and adults at all times.
- Welcomes, encourages and urges anyone who is concerned about any aspect of our safeguarding practice or provision to raise those concerns, as outlined in the Guidance below.
- Welcomes, encourages and urges anyone who is concerned about the safety or welfare of a child or adult to report those concerns as outlined in the guidance below, and in accordance with the guidance found in the 'What Do I Do If?' section of the Diocesan Safeguarding Website.
- Undertakes to treat all such concerns seriously, as outlined in the Guidance below.
- Guarantees that no-one who raises any concern in good faith, even if those concerns are ultimately found to be unfounded, will face any adverse consequences whatsoever.

3.0 Guidance:

What to do if you have a concern:

- In the first instance, speak to the leader of the area of church about which you have a concern). A good principle is that concerns should be dealt with at the lowest level necessary, and only escalated beyond that if those concerns remain, having been expressed. However, if your concern is about the behaviour of a leader in the church (lay or ordained), you may feel that you need to escalate it to someone in authority over them; you would be perfectly justified in doing this.
- Try to be as specific as possible: what or whom are you concerned about exactly? Can you give specific dates or examples of what has caused your concern? Vague concerns are difficult to investigate. If you only have an impression, or cannot give specific examples, you may still wish to express concerns but be open about the limited details you have.
- Try and avoid language that is either accusatory or emotive: your aim is to improve an area of church life, not to put the recipient of your concern on the defensive.
- It is very helpful to quote policy, if you can (although if you cannot, this is not a reason to avoid expressing your concern). This helps the person receiving your concern to see very quickly that you are simply holding the church to account to its own policies, or to Diocesan policies.
- Face-to-face dialogue is usually best, but follow up the conversation in writing – e.g. *“Last Sunday after church I expressed a concern about X, you replied by saying Y, and you said you would get back to me by Z. Please could you reply by confirming my understanding of our conversation is correct?”* A simple written communication such as this can assist greatly in providing clarification to all concerned about what was said (although see below guidance for the person receiving the concern along similar lines).
- If you are satisfied that your concern has been resolved, you can leave the matter there. If you are not, it is important that you escalate it. We suggest that a suitable ‘order of escalation’ would be as follows:
 - 1. Lay Leader in Church (e.g. Safeguarding officer)**
 - 2. Incumbent (and/or churchwarden in a vacancy)**
 - 3. Diocesan Safeguarding Team**
 - 4. Bishop**
 - 5. National Safeguarding Team**
- In escalating your concern, you are acting in an entirely appropriate way. Safeguarding is everyone’s responsibility; there may be the rare occasion where you just have to raise your concern outside of your local parish context, in order to ensure that the children and adults your church ministers to are safe.
- If you feel that the concern has great urgency and cannot be escalated in this manner (for instance if you are concerned about the safety or welfare of a child or adult), then you must raise those concerns without delay with the appropriate statutory authority. Please follow the guidance on the Diocesan Safeguarding Website, under the section entitled ‘What Do I Do If?’. Use the appropriate sub-heading to find out how best to report these concerns.

What to do if you receive a concern:

- If someone tells you that they have a concern, you should arrange to meet them as soon as possible.
- Approach the situation sensitively, recognising the discomfort that the person may feel. Offer to meet them away from the church, and allow them to bring a friend if that would help.

- Do not promise confidentiality: you do not know what they are going to share, but if they share an immediate safeguarding concern you will have no choice other than to break that promise.
- However, be prepared to discuss the possibility of anonymity for the person sharing the concern. People may have reasons to want to stay anonymous, even if they know they have to say something, and closing this option off may mean that the concern never gets aired.
- Reassure the person that there will be no negative repercussions for any concern shared in good faith – even if it turns out to be unfounded or mistaken. ‘Concerns’ shared out of malice or divisiveness are a different matter but at this stage, assume the person is acting in good faith.
- You may wish to suggest sources of support for the person – especially if they are on their own without the support of a friend or family member. Sharing concerns in an institutional context can be very intimidating – even in church – and the concern may have been a source of great anxiety for a long time. The person may be sharing the concern with you because this anxiety has reached the point where they feel compelled to act, and in coming to you they are expressing a great measure of faith that they will be well-received, and not have their intentions misinterpreted. They may wish to speak to someone outside of the immediate context to receive some pastoral support (for instance from a neighbouring parish), or they may wish to speak to someone in the Diocesan Safeguarding Team.
- Recognise that not everyone expresses genuine concerns appropriately. Someone can say something in the wrong manner, at the wrong time and with the wrong language – but still be right. Don’t be too quick to dismiss what someone says because of how they say it.
- Make notes of the conversation, ideally at the time or immediately afterwards.
- Follow up your conversation in writing, as soon as you can – e.g. *“On date X, you expressed your concerns about Y. I replied by saying I would look into what you said, and would get back to you by date Z”*. This helps provide clarity for all involved.
- Make sure you are clear about what you will do with the concern, by when you will do it, and when you will let the person know. Give the person a clear indication of when they can expect to hear back from you, and keep to this promise if you have made no progress – hearing from you with no news is better than not hearing from you.
- Unless the concern is easily resolved, we suggest that you seek advice from the Diocesan Safeguarding Team. If the concern is about the behaviour of an adult in the church, you must follow the policy ‘Managing Allegations in the Church’. If the concern is about the safety and welfare of a child or adult, you must follow the guidance provided in the ‘What Do I Do If?’ section of the Diocesan Safeguarding Website.
- The crucial principle for any adequate Whistleblowing policy is that anyone raising any concern in good faith – whether or not that concern is ultimately justified – should suffer no adverse consequences whatsoever. Further guidance regarding this can be found in the web links in the relevant section of the Diocesan website.

This policy was renewed by the PCC in January 2026.



Victor de Giorgio
Vice Chairman