



WHISTLE BLOWING POLICY

1 OPENING STATEMENT

The Whistleblowing Procedure sets out the framework for dealing with allegations of illegal and improper conduct.

Edge Church is committed to the highest standards of integrity, accountability and safeguarding all people under its care.

This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.

This procedure does not replace other policies and procedures such as the Complaints procedure, the Grievance Policy and other specifically laid down statutory reporting procedures.

2 PURPOSE OF THIS POLICY

The purpose of this Whistleblowing Policy is to:

- Encourage staff, volunteers, congregants, and stakeholders to raise concerns about wrongdoing.
- Provide a safe, confidential process for reporting such misconduct.
- Ensure that reports are handled promptly, fairly, and in a manner that reflects the church's values and legal obligations.
- Protect individuals who report concerns in good faith from retaliation.

3 SCOPE

This policy applies to:

- Staff and employees
- Volunteers
- Leaders, elders, and ministry teams
- Contractors and service providers
- Members, congregants, and beneficiaries
- Any person who interacts with the church's ministries

This policy covers serious concerns that cannot be addressed through normal complaints or grievance procedures.

4 REPORTING

The Church recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty either to the Church and/or to those for whom they are providing a service.

The Church will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

WHAT SHOULD BE REPORTED?

4.1 Whistleblowing relates to serious misconduct, including but not limited to:

- Illegal or Unethical Behaviour
- Fraud, theft, or financial misconduct
- Corruption or bribery
- Forgery or misuse of church documents

4.2 Safeguarding and Child Protection Concerns

- Abuse or suspected abuse of children, youth, or vulnerable adults
- Grooming, exploitation, or inappropriate relationships
- Failure to follow safeguarding policies

4.3 Misconduct by Leaders or Staff

- Abuse of authority or spiritual manipulation or abuse
- Serious breach of trust
- Concealment of wrongdoing

4.4 Health & Safety Risks

- Dangerous practices that risk harm
- Negligence involving facilities or ministries

4.5 Violations of Church Policies or Legal Obligations

- Breaches of data protection laws
- Serious conflicts of interest
- Non-compliance with governance, financial, or HR policies

If you are unsure whether something qualifies, the church encourages you to report it anyway so it can be assessed properly. Note: A grievance or complaint relating to less serious offences should follow the relevant policies.

5 PRINCIPLES UNDERPINNING THIS POLICY

The church commits to:

5.1 Confidentiality

All reports will be treated sensitively and confidentially. Information will only be shared with those directly involved in assessing or investigating the concern.

5.2 Protection from Retaliation

No person will suffer harassment, victimisation, or adverse treatment for reporting a concern in good faith.

5.3 Fair and Impartial Investigation

Investigations will be handled objectively, without bias, and by appropriately trained or authorised individuals.

5.4 Good Faith Reporting

Reports must be made honestly.

Malicious or knowingly false allegations may lead to disciplinary action.

6 HOW TO RAISE A CONCERN

Concerns can be reported through any of the following channels:

6.1 Internal Reporting Options

- Whistleblowing Officer
- Lead Pastor / Elder Chairperson / Elder Deputy Chair (if appropriate)
- Child Protection / Safeguarding Officer (for any child or vulnerable person concerns)

6.2 Reporting Methods

- Confidential email
- Sealed letter
- In-person meeting
- Anonymous hotline or reporting form (if provided)

Anonymous reports will be reviewed, though limited details may restrict investigation.

If the concern involves senior leadership, whistleblowers are encouraged to report directly to the Elders via the Chairperson, or the AOG Group Office.

6.3 Escalation Outside the Church

A whistleblower may also make a protected disclosure to:

- A legal representative
- A regulatory body
- A Member of Cabinet or the Executive Council
- The Public Protector or Auditor-General

but must meet the procedural and good-faith requirements for protection.

7 WHAT HAPPENS AFTER YOU RAISE A CONCERN

7.1 Acknowledgment: You will receive confirmation that your report has been received.

7.2 Initial Assessment: The designated officer will determine whether:

- immediate action is required,
- the matter falls under safeguarding, finance, HR, or governance,
- an internal investigation is required,
- external authorities must be notified.

7.3 Investigation: Conducted promptly, fairly, and in line with church and legal requirements.

7.4 Outcome: You will be informed (at an appropriate level) of the outcome once the investigation concludes, unless prohibited by law or privacy concerns. Anonymous whistleblowers may receive limited or no feedback unless adequate contact details are provided.

7.5 Follow-Up Actions: May include disciplinary measures, safeguarding interventions, policy changes, or referrals to law enforcement or regulatory bodies.

TIMETABLE

Acknowledge the allegation in writing within 10 working days with:

- An indication of how the Church proposes to deal with the matter.
- An estimate of how long it will take to provide a final response. Timeframes are dependent on the nature of the investigation.
- An indication of whether any initial enquiries have been made.
- Information on whistleblower support mechanisms.
- Indication whether further investigations will take place and if not, why not.

8 CHILD PROTECTION, SAFEGUARDING AND MANDATORY REPORTING

Where allegations involve:

- sexual abuse,
- physical abuse,
- neglect, or
- any threat to a child or vulnerable adult,

the church is legally obligated to report the matter to the relevant authorities without delay. Please refer to the Child Protection Policy for more detailed review of the procedures that apply. Whistleblowers will be supported throughout this process.

9 PROTECTION OF WHISTLEBLOWERS

The church will not tolerate:

- intimidation,
- discrimination,
- dismissal,
- demotion, or
- any form of retaliation

against anyone who raises a concern in good faith.

Any retaliation will itself be treated as a disciplinary offence.

In addition to protection, where needed and where resources are available the church will point to support mechanisms available to the whistleblower.

10 RECORDS AND CONFIDENTIALITY

The church will:

- Keep secure, confidential records of all whistleblowing reports.
- Limit access to authorised individuals only.
- Manage data in accordance with privacy legislation (POPIA).

11 COMMUNICATION AND AWARENESS

This policy will be:

- Published on the church's website
- Shared with staff, volunteers, and leaders during induction
- Reviewed annually by church leadership or the board

12 REVIEW OF THIS POLICY

This policy will be reviewed every two years or sooner if:

- legislation changes,
- POPIA regulations evolve
- significant organisational changes occur.

13 DOCUMENT CONTROL

This table shows the changes that have been made to this policy document.

Date	Reference	Description
March 2026	Rozanne Hammer	First Draft of Policy
April 2026	Elders	Approval of Policy