



WHISTLEBLOWING POLICY

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UCKG HELPCENTRE WHISTLEBLOWING POLICY

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1. **POLICY STATEMENT**

The Universal Church of the Kingdom of God (also referred to in this policy as the UCKG HelpCentre, UCKG or the Charity) is a Christian organisation and registered charity in England and Wales, that aims to provide, in all its HelpCentres and related faith and outreach activities, an inclusive environment – in line with Biblical principles – where anyone can learn about and practice the Christian faith, and receive advice, guidance and practical assistance to life's problems. And, that expects the highest standards of conduct and behaviour from all its trustees, ministerial staff (that's bishops, bishops' wives, consecrated and non-consecrated pastors, pastors' wives, assistant pastors, universal biblical institute trainees, missionaries and any other ministerial staff in training), administrative staff (that's full-time employees, part-time employees, any freelancers, any administrative volunteers and anyone on work experience), and all levels of volunteers (that's anyone that volunteers at any church group, activity or event, any community outreach group, activity or event, any charitable or humanitarian activities or events, and fundraising) at all times.

The Charity understands that there might be occasions where such high standards can be seen to not be met, leading trustees, staff and volunteers to become dissatisfied or concerned about certain aspects of the work of the Charity.

The Charity takes every disclosure of concern seriously, and is committed to ensuring that all disclosures of concern raised by trustees, staff and volunteers are properly investigated in an unbiased, non-judgemental, transparent, timely and appropriate manner.

This policy is to:

- provide a fair whistleblowing procedure that is clear and easy for anyone to use
- publicise the existence of a whistleblowing procedure so that anyone knows how to make a disclosure of concern
- ensure that all disclosures of concern are investigated in a timely manner
- make sure that all disclosures of concern are resolved quickly, fairly and effectively
- provide the whistleblower with easy to follow instructions on how to disclose a concern
- provide a fair whistleblowing procedure ensuring the whistleblower is reassured their disclosure of concern is being dealt with seriously
- reassure whistleblowers they will be protected from any reprisals or victimisation
- ensure the whistleblower understands that their concerns will be investigated and they will be informed of the findings of that investigation
- make sure that the Charity learns from all disclosures of concern and applies that learning without delay

2. **AIMS AND PURPOSE OF THIS POLICY**

The UCKG has an unwavering commitment towards its objectives of advancing the Christian faith and implementing general charitable purposes, understanding and embracing the pressures and high expectations placed on faith organisations in modern society.

The Charity believes and is committed to having an effective whistleblowing management system that will help maintain and build stronger relationships with its trustees, ministerial staff, administrative staff, and all levels of volunteers.

Handling disclosures of concern in a transparent and timely manner will:

- demonstrate the Charity's commitment to its objectives and its beneficiaries
- help the Charity find out about any wrongdoings and resolve them

- enable the Charity to learn from any issues and prevent these from reoccurring in future

The Charity understands that there might be incidences where disclosures of concern will be unfounded and even vexatious. But, it expects that the majority will be made in good faith by concerned trustees, staff and volunteers that care about the Charity and the preservation of its reputation and integrity. Perception is personal, and matters of perception can be challenging. Through its investigative process, the Charity will have care to accommodate, understand and address any whistleblower's perception of any specific situation, with the overarching view that without disclosures of concern, an important learning curve would be missed by the Charity.

3. **SCOPE OF THIS POLICY**

This policy is for use by trustees, ministerial staff, administrative staff, and all levels of volunteers that know or suspect that there is some form of wrongdoing occurring within the Charity – whether in the conduct of individuals or its work – and want to disclose a concern and alert the Charity. It applies to all of the Charity's trustees, ministerial staff (that's bishops, bishops' wives, consecrated and non-consecrated pastors, pastors' wives, assistant pastors, universal biblical institute trainees, missionaries and any other ministerial staff in training), administrative staff (that's full-time employees, part-time employees, any freelancers, any administrative volunteers and anyone on work experience), and all levels of volunteers (that's anyone that volunteers at any church group, activity or event, any community outreach group, activity or event, any charitable or humanitarian activities or events, and fundraising). And, relates to all aspects of the work of the Charity – encompassing any and all of its ministerial work (that's regular prayer services, special faith purposes and events, advice and guidance sessions, visits, faith groups, projects and initiatives, etc.), community groups and outreach work, fundraising work or administrative work (including any trading subsidiaries and initiatives) in the United Kingdom and the Channel Islands.

4. **PRINCIPLES OF THIS POLICY**

The practices within this policy are based on the principles contained in UK legislation and any applicable guidelines provided by the Charity Commission for England and Wales, and specifically takes the following into consideration (in alphabetical order):

- Equality Act 2010
- Data Protection Act 2018
- Human Rights Act 1998
- Public Interest Disclosure Act 1998
- UK General Data Protection Regulation

This policy operates in conjunction with the following policies from the Charity (in alphabetical order):

- Complaints Policy
- Employee Handbook
- Fundraising Policy
- Privacy Policy
- Safeguarding Policy
- Vulnerable Donors Policy

5. DEFINITION OF WHISTLEBLOWING

Whistleblowing is when trustees, staff or volunteers disclose a concern due to their knowledge of fact or suspicion that there is some form of wrongdoing occurring within the Charity, that requires an investigation and response.

The *Public Interest Disclosure Act 1998* provides for “qualifying disclosures”, these are disclosures made in the public interest by trustees, staff or volunteers who have 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; or
- concealment of any of the above

is being, has been, or is likely to be, committed. It is not necessary for trustees, staff or volunteers to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. Trustees, staff and volunteers have no responsibility for investigating the matter – it is the Charity’s responsibility to ensure that an investigation takes place.

6. WHO CAN WHISTLEBLOW

Whistleblowing may come from any of the Charity’s trustees, ministerial staff (that’s bishops, bishops’ wives, consecrated and non-consecrated pastors, pastors’ wives, assistant pastors, universal biblical institute trainees, missionaries and any other ministerial staff in training), administrative staff (that’s full-time employees, part-time employees, any freelancers, any administrative volunteers and anyone on work experience), or all levels of volunteers (that’s anyone that volunteers at any church group, activity or event, any community outreach group, activity or event, any charitable or humanitarian activities or events, and fundraising) if these know or suspect that there is some form of wrongdoing occurring in the Charity.

7. PUBLIC INTEREST DISCLOSURE ACT 1998

All trustees that feature in the Charity’s payroll, ministerial and administrative staff that whistle blow are protected by the *Public Interest Disclosure Act 1998*. The remaining trustees and all levels of volunteers are not offered any protection by the *Public Interest Disclosure Act 1998*. Although some trustees and volunteers may qualify for legal protection depending on their status in law.

The *Public Interest Disclosure Act 1998* protects employees who ‘blow the whistle’ about an alleged wrongdoing in an organisation. The Act describes the sorts of disclosures that may be protected as detailed in section 5 of this policy.

8. HOW TO DISCLOSE A CONCERN

A disclosure of concern can be made through any of the following contact details:

- via e-mail: whistleblowing@uckg.org
- via post: C/O Whistleblowing
UCKG HelpCentre
Office Suites
24 Coleridge Road
London N4 3NP

9. HARASSMENT OR VICTIMISATION

The Charity understands that the decision to whistle blow can be difficult, not least because of fear of reprisal from those responsible for the malpractice. The Charity will not tolerate any such harassment or victimisation and will take appropriate action in order to protect trustees, staff, and volunteers who disclose a concern in good faith. In addition, employees (and any qualifying trustees and volunteers) are protected in law by the *Public Interest Disclosure Act 1998* as detailed in section 7 of this policy.

Employees who are subject to disciplinary action or other procedure against them may not have the procedure halted as a result of raising a concern under this policy. Each case will be considered on its merits and the employee will be advised accordingly.

10. CONFIDENTIALITY

Confidentiality will be maintained as far as reasonably possible when handling all whistleblowing, in accordance with the Charity's Privacy Policy accessible via uckg.org/privacy-policy/.

The Charity will make sure that confidentiality will be maintained in a way that only those involved in the actual investigation of the disclosed concern will know its contents. And, that disciplinary procedures will be applied should any trustee, ministerial staff, administrative staff, or any level of volunteers disclose any details to anyone that is not involved in the investigative process.

It must be understood by all trustees, ministerial staff, administrative staff, and all levels of volunteers that any investigation may reveal the source of information and a statement from whistleblowers may be required as part of the evidence.

11. TIMESCALES FOR DISCLOSING A CONCERN

Time being of the essence, the Charity urges that any concerns that any wrongdoing is being, has been, or is likely to be, committed, be disclosed to the Charity as a matter of urgency. And, that, ideally, disclosures of concern be made no later than 30 days from any wrongdoing being committed or when the whistleblower becomes aware of a cause for concern that any wrongdoing is being, has been, or is likely to be committed in relation to any aspect of the work of the Charity.

The Charity understands that it is inevitable that there will be concerns that will be disclosed outside of the above timeframe. And, it is committed to assessing each case on its merits and acknowledges that it might still be possible to investigate a concern when there is good reason for its disclosure to default on the above timeframe.

12. THE WHISTLEBLOWING PROCESS

12.1. STEP 1 – RECEIVING DISCLOSURES

A disclosure of concern can be submitted to the Charity via the contact details advertised for that purpose in section 8. of this policy.

On receiving a disclosure of concern, by whatever contact point a whistleblower chooses to use, the same will be recorded in the Charity's whistleblowing log. If not all relevant details are communicated in the disclosure of concern, or if there are compliance requirements that need to be met in advance, the Charity will contact the whistleblower (via the e-mail whistleblowing@uckg.org) and request any additional information and any supporting evidence. It must be noted that all compliance requirements must be met, and that failure to meet any compliance requirements could lead to the Charity not being able to proceed with the whistleblowing process. The Charity will always make reasonable efforts to investigate concerns where information or compliance requirements are incomplete. However, where insufficient information is available, this may prejudice the investigation and limit its outcome.

An acknowledgment e-mail will be sent to the whistleblower within 5 working days from the date all required information and supporting evidence is provided to the Charity. The acknowledgment e-mail will detail the next step in the process and related timeframe.

12.2. STEP 2 – ASSIGNING DISCLOSURES

The Charity will assess the details and supporting evidence submitted by the whistleblower and assign the concern resolution to the person or department within the Charity that is better qualified or equipped to successfully resolve it.

It is expected that the assignment of the concern resolution by the Charity will be done immediately following the acknowledgement e-mail being sent to the whistleblower. In any event, the assignment of the concern resolution will be completed no later than 3 working days from the date the acknowledgment e-mail is sent to the whistleblower.

12.3. STEP 3 – RESOLVING CONCERNS

Upon being instructed by the Charity to lead the concern resolution process, the assigned person or department will immediately contact the whistleblower confirming the instruction and providing details of the next steps. From this point forward, all exchanges relating to the concern must be exclusively between the whistleblower and the person or department assigned to the concern resolution process. The e-mail whistleblowing@uckg.org must be kept copied in on all exchanges, and if there are any other e-mails that must be copied in, the whistleblower will be informed about them.

The person or department assigned the concern resolution process will conduct all assessments and investigations swiftly without delay and in an unbiased, non-judgemental, transparent and appropriate manner. It will keep the whistleblower updated on progress at regular intervals, with the target of providing a final report on its findings no later than 30 working days from the date of being assigned the concern resolution process.

If for good reason, the person or department assigned the concern resolution process realises their assessments and investigations require a longer work period than expected, making the 30 working days target to provide a final report unrealistic, it will

immediately inform the whistleblower in writing via e-mail. Making sure to provide the whistleblower with updated details of the process and the expected new target date.

The final report into the concern will be provided in writing via e-mail and include a summary of findings, the outcome and learnings together with the next steps should the whistleblower desire to take their complaint further.

13. ANONYMOUS DISCLOSURES

The Charity understands that making a disclosure of concern requires a lot of will power from a whistleblower and that some whistleblowers might feel hesitant and cautious and not want to reveal their identity. At the same time that the Charity appreciates this and welcomes anonymous disclosures, it cannot ignore the fact that anonymity carries the practical consequence of limiting assessments and investigations where further information is required, thus preventing a complete and fair investigation.

For the sake of successfully resolving all disclosures of concern, the Charity encourages any trustees, ministerial staff, administrative staff, and all levels of volunteers to identify themselves when whistleblowing.

Nevertheless, the Charity is committed to and will ensure that anonymous disclosures of concern will always be properly investigated in an unbiased, non-judgemental, transparent, timely and appropriate manner.

14. MALICIOUS DISCLOSURES

The Charity is committed to assessing and investigating, and will accept, any and all disclosures of concern that are made in good faith. However, any and all disclosures of concern made that are deliberately false or malicious or vexatious disclosures, will not be tolerated. If such disclosures are made by trustees that feature in the Charity's payroll or ministerial and administrative staff, they will be regarded as a serious disciplinary offence, which could result in dismissal. If the disclosure is made by any of the remaining trustees or all levels of volunteers, they will be asked to relinquish their roles at the Charity.

The Charity reserves the right to not commit time and resources to assess and investigate any and all disclosures of concern made on the basis of intolerance or discrimination, and malicious or vexatious disclosures. Except where – in order to protect the Charity's reputation, its trustees, ministerial staff, administrative staff, or any volunteer – such disclosures must be investigated in a manner that exposes such malicious intent. The relevant considerations and decision process will be conducted by the Charity's board of trustees and recorded so that it can be reviewed or reassessed as appropriate.

Disclosures of concern made in good faith will always be properly investigated in an unbiased, non-judgemental, transparent, timely and appropriate manner.

15. PROTECTION AGAINST DETRIMENT

The provisions of the *Public Interest Disclosure Act 1998* protect most employees (and others that qualify) from being subjected to any form of detriment by their employer. Detriment can take many forms including denial of promotion, facilities, or training opportunities that the employer may otherwise have offered.

Employees may make a claim for unfair dismissal if they are dismissed for making a protected disclosure.

The Charity encourages concerns to be raised through the procedures set out in this policy as this enables concerns to be investigated promptly and appropriately. However, nothing in this policy is intended to prevent a whistleblower from making a protected disclosure through another lawful route, where permitted by law.

If all trustees that feature in the Charity's payroll, ministerial and administrative staff (and any other qualifying trustees and volunteers) do not follow this policy and procedures set out, which encompasses the requirements of the Public Interest Disclosure Act 1998, the protection against detriment will not apply. Anyone who knowingly makes a false allegation, acts maliciously, or discloses confidential information in bad faith or otherwise than in accordance with applicable law or this policy may be subject to appropriate action. For employees, this may include disciplinary action up to and including dismissal. For any of the remaining trustees and all levels of volunteers, appropriate action may include removal from their roles at the Charity.

16. APPEALING FOR A REVIEW OF THE WHISTLEBLOWING OUTCOME

The Charity is committed to resolving disclosures of concern quickly, fairly and effectively, and that as a consequence, wherever possible, relationships are repaired. It is the Charity's objective that the final report into a disclosure of concern will satisfactorily resolve the issue for all parties concerned.

If the whistleblower is not satisfied with the outcome of the concern resolution process, they may appeal for a review of the whistleblowing outcome. To trigger the appeal, the whistleblower will need to reply to the e-mail with the final report into the disclosure of concern – within 5 working days from the date of the final report – noting their dissatisfaction and that they require a review of the whistleblowing outcome. The Charity will then, within 3 working days from the date the appeal request is made, appoint an officer not previously involved in the process that will review the complete whistleblowing process and related outcome.

It must be noted that the appeal for a review of the whistleblowing outcome is not a reinvestigation of the original disclosure of concern. As such, it should not include new evidence, unless the whistleblower could not, with reasonable diligence, have provided the same evidence when the disclosure of concern was first submitted.

The whistleblower will be provided an appeal report no later than 10 working days from the date an officer is appointed to conduct the review of the whistleblowing outcome. The appeal report is the final outcome that the Charity will provide to the disclosure of concern.

17. EXTERNAL DISCLOSURES

The Charity aims through this policy to provide an internal mechanism for disclosing, investigating and remedying any wrongdoing associated with any aspect of its work. In most cases whistleblowers should not find it necessary to make a disclosure to any external party.

The law recognises that in some circumstances it may be appropriate for whistleblowers to disclose their concerns to an external party such as a regulator. The Charity strongly encourages whistleblowers to seek advice before disclosing a concern to any external party.

18. MONITORING AND LEARNING FROM WHISTLEBLOWING

The Charity is committed to resolving disclosures of concern and learning from each of them and therefore its board of trustees will carry out regular reviews of the whistleblowing log and the handling of all disclosures of concern. The review's aim will be to highlight all learnings

from the concerns resolution process and improve or implement safeguards in order to prevent similar issues occurring in future.

19. RECORDS OF WHISTLEBLOWING

Records of disclosures will be kept for a minimum of 5 years, in line with the Charity's Privacy Policy, after the last contact with the whistleblower. The Charity reserves the right to keep records of disclosures for a longer period if there are indicators that make it necessary and justifiable to retain records for a longer period. The relevant considerations and decision process will be recorded so that it can be reviewed and reassessed as appropriate. The Charity will securely destroy all records of a disclosure when the 5 years from the date of the last contact with the whistleblower have elapsed, or when any justifiable additional retention period ends. The Charity's Privacy Policy is accessible via uckg.org/privacy-policy/.

20. RESPONSIBILITY

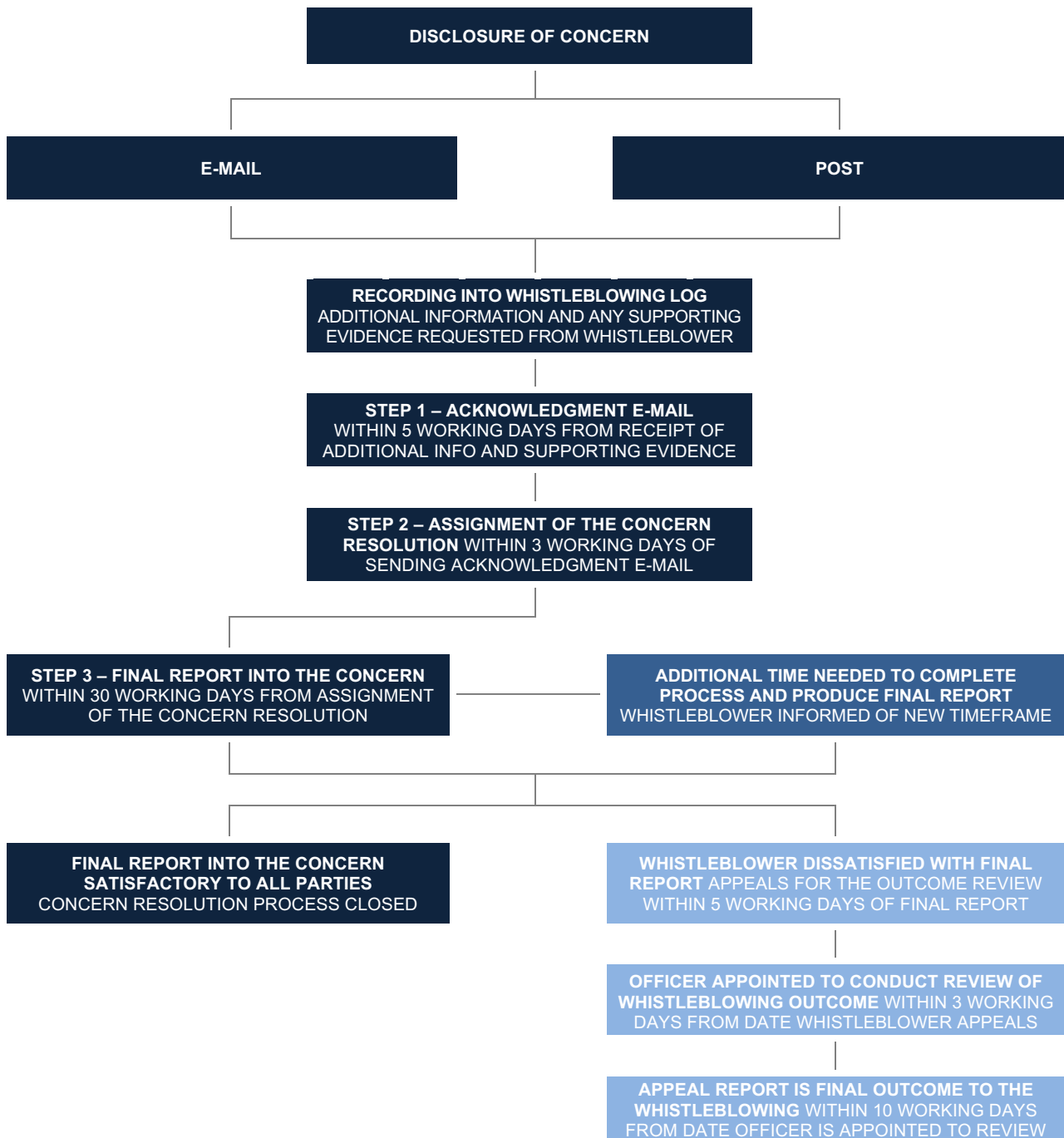
The Charity's board of trustees has overall responsibility for the approval and oversight of this policy.

Responsibility for the implementation and adherence to this policy is delegated to the senior management (that's the bishop in charge and the general manager) of the Charity.

21. REVIEWING THIS POLICY

This policy is approved and endorsed by the Charity's board of trustees and will be reviewed annually, within the first quarter of the year, or whenever there is a learning experience that makes it mandatory to amend/update the policy. All reviews for any given year will be listed in the Version Control Sheet on page 12. The Legal Department is responsible for reviewing and updating this policy.

THE WHISTLEBLOWING PROCESS GRAPHIC



VERSION CONTROL SHEET

Version	Approved by	Valid from	Expired on
01 for the year 2026	Board of Trustees	Fri 21 Aug 2026	-