



COMPLIANCE POLICY HANDBOOK

FEBRUARY 2026



The Church of Scotland

“You are the light of the world. A town built on a hill cannot be hidden. Neither do people light a lamp and put it under a bowl. Instead they put it on its stand, and it gives light to everyone in the house. In the same way, let your light shine before others, that they may see your good deeds and glorify your Father in heaven.

Matthew 5: 14-16

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FIFE PRESBYTERY – PURPOSE AND STRUCTURE

Presbytery is a court of the Church with a representation of elders, minister, and deacons. It can bring about real change in congregational life and mission. Presbytery has representation from every congregation within its bounds, and meetings provide an opportunity for all presbyters to gathering together for fellowship, worship, discussion, and decision-making on matters that affect local parishes and communities.

Presbytery has the task of supporting congregations within its bounds, supporting them in celebrating their successes, and highlighting future areas of development and focus, such as mission and outreach, worship, pastoral care, and resource management.

Presbyteries should also seek to ensure that (taken from CoS website):

- Appropriate support is in place for those exercising ministries within the area
- Resources of ministers, youth workers, pastoral assistants, and more are deployed appropriately around the Presbytery as a result of an agreed plan
- Congregations have appropriate training and skills in a variety of different ministry and missional areas
- They provide opportunities to learn from, and share with, the wider Church both nationally and internationally
- They offer support and provide helpful checks to those maintaining financial records of congregations
- They assist congregations with working on their buildings not only to keep them wind and watertight but to ensure they meet the needs of a modern congregation serving their parish

The Presbytery of Fife was formed from the legacy Presbyteries of Dunfermline, Kirkcaldy and St Andrews on 1st January 2021. The Presbytery covers the entire geographical area of Fife, and at its formation it set as its vision ‘to seek to explore new and innovative ways of working to reduce the legislative burden on churches, to enable them more time and energy for mission’.

Fife Presbytery currently has oversight of 38 charges and 42 congregations¹.

Fife Presbytery, like all other Church of Scotland Presbyteries, has Scottish Charitable Status, the sole charitable purpose being the advancement of religion. The ways in which we fulfil our responsibilities and role within the national church, are some of the ways we meet our charitable purpose.

¹ Correct as at February 2026, and as of 1st March 2026 will be 37 charges and 42 congregations

DUTIES OF A TRUSTEE

All members of Presbytery - recognised ministers and deacons within the bounds, commissioned elders, and appointed balancing elders - are trustees. The primary duties of trustees are outlined below. Members should ensure that they are fully aware of their duties and responsibilities.

A charity trustee must:

- Act in the interests of the charity: Trustees should put the interests of their charity before their own interests or those of any other person or organisation.
- Operate in a manner consistent with the charity's purposes: Trustees should carry out their duties in accordance with the governing document.
- Act with due care and diligence: Trustees should take such care of their charity's affairs as is reasonable to expect of someone who is managing the affairs of another person.
- Ensure that the charity complies with the provisions of the 2005 Charities and Trustee Investment (Scotland) Act and other relevant legislation.

Additional duties for charity trustees include:

- Updating your charity's details: Trustees must make sure that OSCR holds the latest information about their charity on the Scottish Charity Register. This is carried out by Presbytery staff for Presbytery as a registered charity.
- Reporting to OSCR: complying with the statutory duty to supply certain information to OSCR, including annual monitoring, charity accounting, making changes to the charity. For Presbytery, its officials are primarily responsible for ensuring this is done.
- Fundraising: Trustees are responsible for taking control of how their charity raises funds.
- Providing information to the public: Trustees must make sure that their charity meets the statutory provisions when referring to their charitable status, e.g. in advertisements and in their duty to provide information about their charity to the public.
- Financial record keeping and reporting: Charities must keep proper accounting records, prepare a statement of account, including a report on its activities at the end of each financial year, have the statement of account independently examined or audited, send a copy of the accounts, along with the annual return, to OSCR, and retain accounting records for a minimum of six years from the end of the financial year in which they were made. Presbytery staff, along with professional advisers, are primarily responsible for preparing and presenting these documents to Presbytery each year.



SC050563

Bribery and Procurement Policy

February 2026

The next review is due: February 2027

 The Church of Scotland

BRIBERY AND PROCUREMENT POLICY

1. INTRODUCTION

1.1 Further to the work and mission of the Church of Scotland and the terms of the Bribery Act 2010 (the “Act”), it is the policy of Fife Presbytery to conduct all business in an honest and ethical manner. Presbytery takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all dealings as a Church of Scotland Presbytery, both in Scotland and abroad. Presbytery is also committed to implementing and enforcing effective systems to counter bribery and to operate appropriate procurement policies.

1.2 Presbytery will uphold both Church law and all relevant civil laws designed to counter bribery and corruption. Presbytery therefore takes all the provisions of the Act very seriously and will aim to comply with its terms.

1.3 The purpose of this policy is to:

- a) Set out the responsibilities of Presbytery, and of those working with/for Presbytery, in observing and upholding Presbytery’s position on bribery and corruption and the adoption of good procurement procedures; and
- b) Provide information and guidance to those working with/for Presbytery on how to recognise and deal with bribery and corruption issues.

1.4 In the case of registered companies, bribery and corruption is punishable for individuals by up to ten years' imprisonment and we note that organisations found to have taken part in corruption could face an unlimited fine and face damage to their reputation.

1.5 In this policy, **third party** means any individual or organisation with whom those working with/for Presbytery may come into contact.

2. WHO IS COVERED BY THE POLICY?

2.1 This policy applies to all individuals working at all levels with/for Presbytery including members of the Presbytery, charity trustees, other office bearers, corresponding members, employees (whether permanent, fixed-term or temporary), contractors, volunteers, agents, or any other person associated with the Presbytery, wherever located (collectively referred to as “members” in this policy).

2.2 In this policy, references to “the Presbytery” or to “we”, “us” or “our” refers to the Presbytery, whether acting as a Presbytery or through any of its Committees or other bodies or individuals.

2.3 In this policy, “you” refers to any or all of the members as defined in 2.1

3. WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Examples:

a) **Offering a bribe**

You offer to sell a building to the Presbytery Clerk’s daughter at a reduced price, but only if she agrees to make you a gift in cash or kind or donate to Presbytery funds using gift aid. This would be an offence as you are making the offer which could operate to your or the Presbytery’s financial advantage. It may also be an offence for the potential purchaser to accept your offer.

b) **Receiving a bribe**

A roofing contractor offers you expensive tickets for a major sporting event, but makes it clear that in return they expect you to use your influence in the Presbytery to ensure he is employed whenever roofing services are required. It is an offence for a contractor to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

c) **Bribing a foreign official**

You arrange for the Presbytery to pay an additional payment to a foreign official to speed up an administrative process. The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain an advantage for Presbytery. Other members who agreed to the offer being made may also be found to have committed an offence.

4. GIFTS AND HOSPITALITY

4.1 This policy does not prohibit the making (out of Presbytery funds) of token gifts. Nor does it prevent members of the Presbytery receiving token gifts in the context of their Presbytery duties.

- 4.2** The making of a gift is not prohibited, if the following requirements are met:
- a) It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
 - b) It complies with Scots law.
 - c) It is given in name of the Presbytery, rather than in name of an individual member.
 - d) If made out of general Presbytery funds (as opposed to following a special collection or from a designated benevolence fund), it does not include cash or a cash equivalent (such as gift certificates or vouchers) in excess of a token amount, £35 being the recommended maximum².
 - e) It is appropriate in the circumstances, for example, a small gift at Christmas time.
 - f) Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time.
 - g) It is given openly, not secretly.

Gifts should not be offered to, nor indeed accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the Presbytery. However, aside from token gifts, it is unlikely that the use of charitable funds for this purpose could ever be justified and we will always seek advice from the Church's Law Department before making a gift in this situation.

- 4.3** If a member, in connection with the work of the Presbytery, receives a gift in cash or kind given to them personally (as opposed to a charitable donation either for general Presbytery purposes or for a particular purpose such as a contribution to a particular fund), they should, before accepting it, give careful consideration as to whether it is an expression of personal appreciation or whether it could be intended as an inducement to place business with the donor or could indeed be a reward for past business. If there is good reason to suspect that something may be expected in return, the gift should be declined. Where a gift is accepted or declined, and, under common-sense consideration, could be regarded as being material, this should be reported to the Presbytery Clerk and recorded by the Clerk in the book maintained for this purpose. For the avoidance of doubt, a one-off gift of £35 or less would not be regarded as being material.

- 4.4** This policy does not affect the giving or receiving of normal and appropriate hospitality. In any case where hospitality is suspected as being a cover for bribery, the

² In a similar way to the use of monies at congregational level, presbytery funds should be used for charitable purposes i.e. the advancement of religion.

authorities will look at such things as the level of hospitality offered, the way in which it was provided, and the level of influence the person receiving it had on the decision in question. However, as a general proposition, we regard hospitality and expenditure to be in order, provided it is proportionate and reasonable, having regard to the activities and financial means of the Presbytery.

5. WHAT IS NOT ACCEPTABLE?

It is not acceptable for you, or someone on your behalf, to:

- a) Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a financial or business advantage will be received, or to reward a financial or business advantage already given;
- b) Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- c) Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- d) Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the Presbytery in return;
- e) Threaten or retaliate against another member who has refused to commit a bribery offence or who has raised concerns under this policy; or
- f) Engage in any activity that might lead to a breach of this policy.

6. FACILITATION PAYMENTS AND KICKBACKS

6.1 Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. We do not make, and will not accept, facilitation payments or "kickbacks" of any kind even if such payments are routine and expected in a country overseas where we may occasionally have a connection.

6.2 If you as a member are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt that details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Presbytery Clerk who, if in cases of doubt, will raise them with the Church's Law Department.

6.3 Kickbacks are typically payments made in return for a business favour or advantage. All members must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

7. DONATIONS

Presbytery will only make charitable donations that are legal and ethical under Church and Scots law. No donation should be offered or made without the prior approval of the Presbytery Clerk. Any donation must be to further the work of Presbytery and its mission and that of the Church of Scotland generally and should be made only from a special collection for that purpose.

8. PROCUREMENT

8.1 Small Contracts/Purchases

For contracts and purchases of less than £1,000 (ex VAT) the Business Committee, may place the contract or make the purchase without the necessity to tender, although the committee may decide that securing competitive quotations will be desirable, depending on the circumstances.

8.2 Competitive Tenders

For a contract or purchase in excess of £1,000 (ex VAT) normal practice will be for no less than two competitive tenders to be received. When approval for the contract of purchase is being sought from the Business Committee, confirmation that funds to cover the costs are available will also be submitted in addition to the appropriate documentation. Where it is decided to accept a tender/quote that is not the lowest obtained, the reason for doing so will be recorded in the minute and reported to Presbytery.

8.3 Negotiated Contracts

In exceptional circumstances, a negotiated tender/quote may be acceptable, for instance where the contractor has a long relationship with Presbytery and thus has some specialised and detailed knowledge pertinent to the works to be undertaken or purchase to be made. In such an instance, this course of action must be agreed in advance of any negotiations by the Business Committee and this, together with the reason for so doing, is to be formally recorded in the Business Committee minutes, and reported to and approved by Presbytery.

9. CONFLICTS AND DECLARATIONS OF INTEREST

Members must avoid getting into a situation where their duties to Presbytery could be said to conflict with their own personal interests. At meetings, if you know in advance that an issue in which you may have an interest is scheduled to be discussed, you should declare your interest at the start of the meeting.

You should, however, declare an interest at any point in the meeting if that appears appropriate. Declaring a material interest has the effect of prohibiting any participation in discussion and voting. If your interest is a material financial one, you should leave the room whilst the item concerned is being discussed. It requires an exercise of judgement on your part to decide what a material interest is. You must consider the relationship between your interest and all the relevant individual circumstances surrounding the particular matter. It will probably be advisable to seek the view of the Moderator/Presbytery Clerk in advance of the meeting.

Further information on Conflicts of Interest is contained in the Conflict of Interest Policy (pages 15-25)

10. YOUR RESPONSIBILITIES

- 10.1** You must ensure that you read, understand and comply with this policy.
- 10.2** You must record all hospitality or gifts accepted or declined in the book referred to in section 4 (3), which will be subject to review.
- 10.3** You must ensure all expense claims relating to hospitality and gifts or expenses incurred to third parties are submitted for approval by the Presbytery Clerk/Presbytery Treasurer and should specifically advise them in writing of the reason for the expenditure.
- 10.4** All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness by the Presbytery Treasurer. No accounts must be kept "off-book" to facilitate or conceal improper payments. If this occurs, further action will be taken, as determined by the Business Committee.

11. HOW TO RAISE A CONCERN

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with Presbytery Clerk in the first instance.

12. WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION

It is important that you tell Presbytery Clerk as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

13. PROTECTION

13.1 Members who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

13.2 We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

14. WHO IS RESPONSIBLE FOR THE POLICY?

14.1 The Presbytery has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those associated or connected to us comply with it.

14.2 The Presbytery Clerk has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

15. MONITORING AND REVIEW

15.1 The Business Committee, with the Presbytery Clerk, will monitor the effectiveness and review the implementation of this policy and will regularly consider its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

15.2 All members are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

15.3 Members are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Presbytery Clerk.

15.4 This policy does not form part of any employee's contract of employment and it may be amended at any time.

SCHEDULE: POTENTIAL RISKS SCENARIOS / RED FLAGS

The following is a list of possible **red flags** that may arise and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags or other suspicious circumstances, you must report them promptly to the Presbytery Clerk:

- a) You become aware that a third party engages in, or has been accused of engaging in, improper business practices.
- b) You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a special relationship with foreign government officials.
- c) A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us.
- d) A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- e) A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business.
- f) A third party requests an unexpected additional fee or commission to "facilitate" a service.
- g) A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- h) A third party requests that a payment is made to "overlook" potential legal violations.
- i) A third party requests that you provide employment or some other advantage to a friend or relative.

- j) You receive an invoice from a third party that appears to be non-standard or customised.
- k) A third party insists on the use of side letters or refuses to put terms agreed in writing.
- l) You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
- m) A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.
- n) You are offered an unusually generous gift or offered lavish hospitality by a third party.



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Complaints Policy and Process

February 2026

The next review is due: February 2027

 The Church of Scotland

COMPLAINTS POLICY AND PROCESS

1. INTRODUCTION

The purpose of this policy is to ensure that members of Presbytery are aware of how to raise a complaint, the manner in which any complaint raised is subsequently dealt with, and the process that is followed in dealing with any complaint.

The policy is in place to:

- a) oversee all matters relating to Ministers, Deacons, Elders and local office bearers in terms of the Discipline Act (Act I 2019) and provide pastoral care to those involved in the discipline process.³
- b) Hear and dispose of appeals against the decision of a Kirk Session.

Responsibility for the oversight and application of the policy is devolved to the Superintendence Committee, who report to the Business Committee.

2. INFORMAL NOTIFICATION OF COMPLAINT

Initial discussion with the Presbytery Clerk will be beneficial in ascertaining whether the issue is in fact eligible to be classed as an official complaint.

The Presbytery Clerk will advise the ‘complainant’ whether the matter can be dealt with informally or has to proceed to the more formal notification stage.

For an initial conversation, you should contact the Presbytery Clerk, Rev. Alec Shuttleworth to discuss your complaint before proceeding to the more formal steps.

The Presbytery Clerk can be contacted as follows:

Email: ashuttleworth@churchofscotland.org.uk

Mob: 07340 461921

3. FORMAL NOTIFICATION OF COMPLAINT

If the matter is to be taken further, then you will need to write to the Presbytery Clerk (either by letter or email), setting out the following (the Presbytery Clerk can assist you with this):

³ This procedure applies to Ministers, Ordained Local Ministers, Deacons, Elders and Readers. NOTE: Organists, MDS workers, Mission Partners, 121 staff, Youth Workers, and Parish Assistants have their own specific procedure.

- Your contact details (and whether you are a Church member or office bearer).
- Details of the person you are complaining about.
- The nature of your complaint.
- Specific details of the circumstances (including, where possible, names of individuals, places, dates etc).

Upon receipt of a written complaint, the Presbytery Clerk will acknowledge this in writing **within seven days**.

All information supplied in connection with a complaint will be treated sensitively, and will be treated confidentially as far as possible.

4. DEALING WITH A COMPLAINT

The process for how complaints will be dealt with is as follows:

- The Presbytery Clerk will send the written complaint to the Convener of Presbytery's Superintendence Committee.
- A meeting of that Committee will then be called to consider the complaint.
- Following this meeting, a member of the Committee will contact the complainant to discuss the complaint and, if appropriate, arrange to meet with them.
- The Superintendence Committee may also forward a copy of the complaint to the respondent (the subject of the complaint), if it considers this to be in their best interest⁴. The Committee may similarly meet with the respondent.
- The Committee shall make such enquiries as it considers appropriate, and may hold more than one meeting separately with the complainant and with the respondent. If it considers this to be appropriate and both parties' consent, the Committee may facilitate a mediated meeting between you and the respondent.

The Superintendence Committee will endeavour to provide the complainant with an initial response on the complaint within a period of **20 working days** from when it first considered the complaint.

⁴ The respondent does not have a right to see any letter or email from the complainer in which the complaint is narrated - sharing this with the respondent may inflame matters, in some circumstances. What is essential is that the respondent is informed of all relevant content.

5. THE OUTCOME

Upon completion of its enquiries, the Committee will hope to have achieved one of the following outcomes (although this list is not exhaustive):

- You as the complainer are satisfied that the matters raised in the complaint have been resolved.
- You as the complainer and the respondent have reached a mutual agreement that the matter need go no further.
- You as the complainer agree with the respondent that the matter may be referred to mediation.
- The Committee will make a recommendation to Presbytery that the respondent be given an instruction or advice as to their future conduct, or be issued with a reprimand.
- The complaint has been dropped or dismissed.
- The complaint having been dealt with, the matter is concluded, despite no agreement having been reached.

The Procedure outlined above is subject to a right of procedural review. Further information about this will be given to you if it applies.

Details of the Church of Scotland Complaints procedure can be found here <https://www.churchofscotland.org.uk/contact/complaints>



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Conflict of Interest Policy

February 2026

This policy will be reviewed initially after one year,
then at 3 year intervals

The next review is due: February 2027



The Church of Scotland

CONFLICT OF INTEREST POLICY

1. INTRODUCTION

Conflicts of interest affect all types and sizes of organisations. In a charity context, a conflict of interest can inhibit free discussion, and can lead to decisions that are not in the best interests of the charity and that are invalid or open to challenge. Conflicts of interest can also be damaging to a charity's reputation and the public's confidence and trust in charities in general.

Charity trustees have a primary duty in terms of section 66 of the Charities and Trustee Investment (Scotland) Act 2005 to act in the best interests of the charity at all times.

All those who are members of the Fife Presbytery are the charity trustees of the Presbytery.

The Presbytery recognises that its trustees can find themselves in a situation that may give rise to conflicts of interest, whether potential or actual, perceived or alleged. Where trustees can identify a conflict and measures can be put in place to prevent the conflict affecting decision-making, then the harmful effects of a conflict of interest can be prevented. The proper handling of conflicts of interest is an essential part of good decision-making by trustees.

The Presbytery has developed this policy to provide guidance to all trustees regarding conflicts of interest, in order to avoid any actual or potential conflicts of interest, perception of bias or misuse of authority, and to ensure and evidence that all decisions by individual trustees on behalf of the Presbytery are taken only in the best interests of the Presbytery at all times..

2. SCOPE AND PURPOSE

This policy applies to all trustees of the Presbytery and to all bodies, groups and committees meeting under the auspices of the Presbytery. All individuals in the Presbytery who are involved in the management of its affairs to a greater or lesser extent, but are not members of the Presbytery, can be seen as "shadow trustees" and are subject to the same duties as the trustees. Where the word "trustee" is used in this policy, it covers both charity trustees and shadow trustees.

The Presbytery is committed to ensuring that all trustees act in its best interests at all times. This policy aims to provide guidance to those involved in management and decision-making, and seeks to ensure that all trustees are seen to be acting in accordance with well-recognised rules of good governance.

It is inevitable that conflicts of interest will arise. This policy aims to ensure that any conflict is identified and managed appropriately.

It is the responsibility of each individual to recognise situations in which he or she has a conflict of interest, or might reasonably be seen by others to have a conflict, to disclose that conflict to the appropriate person, and to take such further steps as may be appropriate, as set out in more detail under the procedure below.

If an individual is uncertain about how this policy might affect his or her activities, or has any questions about its application, he or she should contact the Presbytery Clerk or the Law Department for further advice.

3. WHAT IS A CONFLICT OF INTEREST

A conflict of interest is any situation in which a trustee's personal interests or loyalties could, or could be seen to, prevent the trustee from making a decision only in the best interests of the Presbytery.

A conflict of interest arises when the interests of a trustee (or a person closely connected to them, whether by family or business) are incompatible or in competition with the interests of the Presbytery. Such situations present a risk that trustees will make a decision based on external influences and that such a decision will not be in the best interests of the Presbytery.

The most common types of conflict include:

- **Direct financial interest** – where there is, or appears to be, an opportunity for personal financial gain.
- **Indirect financial interest** – the financial gain of a close relative or close friend or business associate.
- **Non-financial or personal conflicts** – a non-financial interest can take many forms and is generally one where there is, or appears to be, an opportunity for personal benefit, advantage or enhancement to prospects for the individual (direct), or similar gains to someone in their immediate family or a person with whom the individual has a close personal relationship (indirect).
- **Conflicts of loyalties** – a particular type of conflict of interest, in which a trustee's loyalty or duty to another person or organisation could prevent the trustee from making a decision only in the best interests of the Presbytery.

The level of financial interest should not be a determining factor in deciding whether a conflict should be disclosed. The Presbytery expects disclosure of any financial interest, however small.

A conflict of loyalty may arise where a trustee is also a charity trustee or member of another body (such as, for example, another Church court or a local community group) if that could (or could be seen to) interfere with their ability to make decisions only in the best interests of Presbytery. In such circumstances, a trustee must act at all times only in the best interests of Presbytery in carrying out their trustee role, regardless of how decisions made in that role may impact on the other body.

A conflict of interest may arise where a trustee is also an employee of the Presbytery or of another body. Employment by the Presbytery does not confer membership of the Presbytery upon any individual. Presbytery will normally appoint employees to be corresponding members of Presbytery. Except where expressly agreed by the Presbytery, no employee of the Presbytery may be a member of any Committee of the Presbytery.

The interests of the Presbytery and such other body will for the most part be consistent, or complementary, but it is inevitable that a conflict will arise on occasion. Whether a conflict of loyalty is of such low risk that the affected trustee can participate in the decision is a judgement for the trustees, and will depend on the particular decision and circumstances of the case. It will often be the case that the potential damage that could be caused by any conflict is so minimal that it can be managed without any difficulty. The trustees must take all relevant factors into account and be ready to explain their approach if asked to do so.

4. RECOGNISING AND DISCLOSING CONFLICTS OF INTEREST

All trustees are required to recognise and disclose activities that might give rise to conflicts of interest, or the perception of conflicts of interest, at the earliest opportunity. This allows the other trustees to consider the issue of the conflict of interest to ensure that any potential effect on decision-making is eliminated and to demonstrate that their decision was made only in the best interests of Presbytery. If properly managed, activities can proceed as normal, whilst at the same time upholding the trustees' obligations to the Presbytery, meeting regulatory and other external requirements, and protecting the integrity and reputation of the Presbytery and the wider Church. By contrast, conflicts that are not managed effectively may jeopardise Presbytery's public standing, and may cause serious damage to the reputation of Presbytery, the individuals concerned, and the wider Church. It is therefore Presbytery's policy to ensure that, when conflicts or perceived conflicts of interest arise, they are acknowledged and disclosed.

There can be situations in which the appearance of conflict of interest is present even when no conflict actually exists. It is important for all trustees that they consider how it might be perceived by others when evaluating a potential conflict of interest. The duty to declare a possible conflict applies to the perception of the situation as much as to the actual existence of a conflict. When deciding whether such an interest is present, trustees should ask themselves whether a reasonable member of the public, with knowledge of all of the relevant facts of the situation, would think that their judgement might be prejudiced or influenced by their private or personal interest. This is an objective test. Trustees must not decide whether they would take a decision without prejudice, but whether they could be seen as doing so.

There may, exceptionally, be circumstances in which a conflict cannot be satisfactorily managed. In such circumstances, the trustees should remove the conflict by not proceeding with a proposed course of action, by proceeding in a different way so that the conflict does not arise, by not appointing a particular trustee, or by requiring the resignation of a trustee.

5. PROCEDURE

It is the duty of every trustee to disclose any conflict of interest or any circumstances that might reasonably give rise to the perception of conflict of interest.

The following procedure should be followed to ensure that conflicts of interest are identified at as early a stage as possible and that, once identified, action is taken to ensure that the conflict of interest does not give rise to a situation where trustees take decision that are, or could be perceived as being, not in the best interests of Presbytery.

5.1 – Register of Interests

- 5.1.1 Before they are appointed, new trustees will be informed that they will be expected to adhere to this conflict of interest policy, and a copy of the policy will be provided to them. Any potential conflict of interest should be discussed with the Presbytery Clerk prior to taking up the position.
- 5.1.2 On appointment, trustees will be required to complete a Declaration of Interests form (Appendix 1). A Register of Interests will be maintained by the Presbytery Clerk and updated when a material change occurs (Appendix 2). Membership of a congregation within the bounds of the Presbytery will not require disclosure in the Register of Interests. The Register of Interests must be reviewed and updated on an annual basis
- 5.1.3 A copy of the policy will be provided to all current trustees, who will also be required to complete a Declaration of Interests form

5.2 - Disclosure

Any failure to disclose a potential, actual or perceived conflict of interest is a serious issue. A trustee who fails to disclose a potential, actual or perceived conflict will have failed to comply with their statutory duty.

There should be a standard agenda item at the beginning of each Presbytery meeting to declare any potential, actual or perceived conflicts of interest.

A trustee should declare any interest they have in an item to be discussed, at the earliest possible opportunity and before any discussion of the item itself. If a trustee is uncertain whether they are conflicted, they should err on the side of openness, declaring the issue and discussing it with the other trustees.

If a trustee is aware of an undeclared conflict of interest affecting another trustee, they should notify the other trustees or the Moderator. All trustees have a collective responsibility to manage conflicts and to act clearly in the Presbytery's best interests.

5.3 - Managing Conflicts of Interest

If a potential, actual or perceived conflict of interest is identified, the trustees must act in the best interests of the Presbytery. This means the trustees must consider the issue of the conflict of interest so that any effect this may have on good decision-making is eliminated.

In deciding whether a conflict of interest exists trustees must consider the following:

- Has the decision been taken in the best interests of Presbytery?
- Does the decision protect the reputation of Presbytery?
- What impression does the decision have on those outside of Presbytery, including the wider Church?
- Can the trustees demonstrate that they have made the decision in the best interests of Presbytery and independently of any competing interests?
- Does the presence of a conflicted trustee inhibit free discussion and influence the decision-making process in any way?

Where the trustees decide that there is a potential, actual or perceived conflict of interest, the conflicted trustee should not participate in the decision-making process.

The conflicted trustee should withdraw from the meeting prior to discussion of the item, unless the Convener or Moderator gives them permission to remain.

Before withdrawing from the meeting, the conflicted trustee should be given the opportunity to provide any information necessary to help the remaining trustees make a decision in the best interests of Presbytery.

A conflicted trustee should not take part in any vote on the item that is the subject of the conflict.

5.4 - Recording

In all instances where a potential, actual or perceived conflict of interest is disclosed at a trustees' meeting, the minutes of the meeting should record the trustees' discussion and the decision taken.

If there is a discussion, the written record of the decision should include:

- The nature of the conflict;
- Which trustees were affected;
- Whether any conflicts of interest were declared in advance;
- An outline of the discussion;
- Whether anyone withdrew from the discussion; and
- How the decision was taken in the best interests of the Presbytery.

6. CONSEQUENCES OF BREACH

Where conflicts of interest are not identified or properly managed, there can be serious consequences for both the affected trustee and the Presbytery. Decisions taken may not be valid and could be challenged, and could damage the reputation of the Presbytery, the wider Church and the trust of the public.

If the circumstances are sufficiently serious, a failure to disclose a conflict of interest could therefore result in a disciplinary process being triggered.

7. REVIEW

This Policy will be reviewed by Presbytery after one year, and thereafter every three years.

APPENDIX 1: Declaration of Interests Form

I declare that I have competing interests in relation to my position as a trustee with Fife Presbytery. All competing interests are noted below. I undertake to review the accuracy of the information provided on an annual basis.

I understand that the information provided will be processed in accordance with the data protection principles as set out in the Data Protection Act 2018. Data will be processed only to ensure that trustees act in the best interests of the Presbytery. I give my consent for it to be used for the purposes described in the Presbytery's Conflict of Interest policy and for no other purpose.

I understand that this declaration will be retained by the Presbytery Clerk and made available for inspection on request.

Name / Signature:	
Date:	

Membership of congregation/Presbytery/other Church of Scotland body

	Name of Congregation / Presbytery or other Church of Scotland office	Date of appointment	Nature of appointment and any other relevant information
Details of trusteeship which may be significant to, or relevant to, or bear upon the interests of Presbytery			

Other areas that present potential conflicts of interest

	Name and nature of Organisation/Business	Date of appointment	Nature of appointment and any other relevant information
Details of trusteeship held which may be significant or relevant to, or bear upon the interests of the Presbytery			
Employment, including self-employment that may be significant or relevant to, or bear upon the interests of Presbytery			
Directorship, membership, or other office that may be significant or relevant to, or bear upon the interests of Presbytery			

Date received	
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Note - If further details need to be given, please use a separate sheet of paper and attach to Declaration.

APPENDIX 2: Register of Interests

CONFLICTS POLICY

The charity trustees of Fife Presbytery have implemented a Conflict of Interest Policy, under which they have agreed that a register will be kept of all interests declared by the charity trustees.

MAINTENANCE OF REGISTER

This register is maintained by the Presbytery Clerk, who must:

- a. Record all conflicts, gifts and hospitality declared by the trustees in accordance with the Policy; and
- b. Circulate amendments of additions to the register (if any) to the trustees at the start of each charity trustee meeting.

REVIEWING THE REGISTER

As agreed in the Policy, all charity trustees must review the information relating to themselves contained in this register at least once in every 12-month period, and declare that the information is correct or make a further declaration as necessary.

INSPECTION OF REGISTER

This register is available for inspection by any charity trustee and by any member of the Presbytery on request.

REGISTER OF INTERESTS

Date notified	Name of charity trustee	Brief details of interest notified	Brief details of any action taken



SC050563

Data Protection Policy

February 2026

The next review is due: February 2027



The Church of Scotland

DATA PROTECTION POLICY

1. OVERVIEW

Fife Presbytery (the “Presbytery”) takes the security and privacy of personal information seriously. As part of our activities, we need to gather and use personal information about a variety of people, including members, former members, employees, office-holders and generally people who are in contact with us. The Data Protection Act 2018 (the “2018 Act”) and the General Data Protection Regulation (“GDPR”) regulate the way in which personal information about living individuals is collected, processed, stored or transferred.

This policy explains the provisions that we will adhere to when any personal data belonging to or provided by data subjects, is collected, processed, stored or transferred on behalf of Presbytery. We expect everyone processing personal data on behalf of Presbytery (see section 5 for a definition of “processing”) to comply with this policy in all respects.

The Presbytery has a separate Privacy Notice, which outlines the way in which we use personal information provided to us. A copy can be obtained at any time from the Presbytery Clerk and is attached as an appendix to this policy for reference.

All personal data must be held in accordance with Presbytery’s Data Retention Policy, which must be read alongside this policy. A copy of the Data Retention Policy is also enclosed. Data should only be held for as long as necessary for the purposes for which it is collected.

This policy does not form part of any contract of employment (or contract for services if relevant) and can be amended by Presbytery at any time. It is intended that this policy is fully compliant with the 2018 Act and the GDPR. If any conflict arises between those laws and this policy, the Presbytery intends to comply with the 2018 Act and the GDPR.

Any deliberate or negligent breach of this policy by an employee of Presbytery may result in disciplinary action being taken in accordance with our disciplinary procedure. It is a criminal offence to conceal or destroy personal data that is part of a subject access request (see Section 12 below) and such conduct by an employee would amount to gross misconduct, which could result in dismissal.

2. DATA PROTECTION PRINCIPLES

Personal data will be processed in accordance with the six ‘Data Protection Principles.’ It must:

- Be processed fairly, lawfully and transparently;
- Be collected and processed only for specified, explicit and legitimate purposes;
- Be adequate, relevant and limited to what is necessary for the purposes for which it is processed;

- Be accurate and kept up to date, and any inaccurate data must be deleted or rectified without delay;
- Not be kept for longer than is necessary for the purposes for which it is processed; and
- Be processed securely.

We are accountable for these principles and must be able to demonstrate compliance.

3. DEFINITION OF PERSONAL DATA

“**Personal data**” means information relating to a living person (known as a “data subject”) who can be identified from that data on its own, or when taken together with other information which is likely to come into the possession of the data controller. It includes any expression of opinion about the person and an indication of the intentions of the data controller or others, in respect of that person. It does not include anonymised data.

This policy applies to all personal data, whether it is stored electronically, on paper or on other materials.

4. DEFINITION OF SPECIAL CATEGORIES OF PERSONAL DATA

Special categories of personal data are types of personal data consisting of information revealing:

- Racial or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union membership;
- Genetic or biometric data;
- Health;
- Sex life and sexual orientation; and
- Any criminal convictions and offences.

A significant amount of personal data held by Presbytery will be classed as special category personal data, either specifically or by implication, as it could be indicative of a person’s religious beliefs.

5. DEFINITION OF PROCESSING

‘Processing’ refers to any operation which is performed on personal data, such as collection, recording, organisation, structuring or storage; adaptation or alteration; retrieval, consultation or use; disclosure by transmission, dissemination or otherwise making available; and restriction, destruction or erasure.

6. HOW PERSONAL DATA SHOULD BE PROCESSED

- 6.1** Everyone who processes data on behalf of the Presbytery has responsibility for ensuring that the data they collect and store is handled appropriately, in line with this policy, our Data Retention Policy and our Privacy Notice.
- 6.2** Personal data should only be accessed by those who need it for the work they do for or on behalf of Presbytery. Data should be used only for the specified lawful purpose for which it was obtained.
- 6.3** The legal bases for processing personal data (other than special category data, which is referred to in Section 8 below) are that the processing is necessary for the purposes of Presbytery's legitimate interests; or that (so far as relating to any staff whom we employ) it is necessary to exercise the rights and obligations of the Presbytery under employment law.
- 6.4** Personal data held in all ordered manual files and databases should be kept up to date. It should be shredded or disposed of securely when it is no longer needed. Unnecessary copies of personal data should not be made.

7. PRIVACY NOTICE

If our use of personal data is what someone would reasonably expect, we will provide information about this using a Privacy Notice when gathering the information. The sample Privacy Notice is contained as an appendix to this document.

If someone would not reasonably expect the way we use their personal data, we will issue information about this using a styled Privacy Notice, which will be issued to them at the point when the data is being collected.

8. WHEN IS CONSENT NEEDED FOR THE PROCESSING OF PERSONAL DATA?

A significant amount of personal data held by Presbytery will be classed as special category personal data, as it could be indicative of someone's religious beliefs.

Processing of such special category data is prohibited under the GDPR unless one of the listed exemptions applies. Two of these exemptions are especially relevant (although others may also apply):

- The individual has given explicit consent to the processing of the personal data for one or more specified purposes; OR
- Processing is carried out in the course of its [the Presbytery's] legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have

regular contact with it in connection with its purposes and that the personal data is not disclosed outside that body without the consent of the data subjects.

Most of the processing carried out by Presbytery will fall within the latter exemption, and will be carried out by Presbytery with appropriate safeguards to keep information safe and secure. This information will not be disclosed outside the Presbytery without consent. Such processing will not require the explicit consent of the data subject.

Where personal data is to be shared with a third party, Presbytery will only do so with the explicit consent of the data subject. For example, personal data will only be included in a directory for circulation or included on a website where consent has been obtained.

If consent is required to process the information, this will be recorded using the style consent form. If consent is given orally rather than in writing, this fact should be recorded in writing.

9. KEEPING PERSONAL DATA SECURE

Personal data should not be shared with those who are not authorised to receive it. Care should be taken when dealing with any request for personal information over the telephone or otherwise. When giving out information, identity checks should be carried out to ensure that the person requesting the information is either the individual concerned or someone properly authorised to act on their behalf.

Hard copy personal information should be stored securely (in lockable storage, where appropriate) and not visible when not in use. Filing cabinets and drawers and/or office doors should be locked when not in use. Keys should not be left in the lock of the filing cabinets/lockable storage.

Passwords should be kept secure, should be strong, changed regularly and not written down or shared with others.

Emails containing personal information should not be sent to or received at a work email address (other than an @churchofscotland.org.uk address), as this might be accessed by third parties.

The 'bcc' rather than the 'cc' or 'to' fields should be used when emailing a large number of people, unless everyone has agreed for their details to be shared amongst the group.

If personal devices have an @churchofscotland.org.uk account linked to them these should not be accessed on a shared device for which someone else has the pin code.

Personal data should be encrypted or password-protected before being transferred electronically. Personal data should never be transferred outside the European Economic Area except in compliance with the law.

10. SHARING PERSONAL DATA

We will only share someone's personal data where we have a legal basis to do so, including for our legitimate interests within the Church of Scotland (either within the Congregations of the Presbytery or to enable central databases held within the Church Office at 121 George Street, Edinburgh to be maintained and kept up to date). This may require information relating to criminal proceedings or offences or allegations of offences to be processed for the protection of children or adults who may be at risk and to be shared with the Church's Safeguarding Service or with statutory agencies.

We will not send any personal data outside the European Economic Area. If this changes, all individuals affected will be notified and the protections put in place to secure your personal data in line with the requirements of the GDPR will be explained.

11. HOW TO DEAL WITH DATA SECURITY BREACHES

Should a data security breach occur, the individual will notify the Presbytery Clerk immediately. If the breach is likely to result in a risk to the rights and freedoms of individuals, then the Information Commissioner's Office must be notified within 72 hours.

Breaches will be handled by the Presbytery Clerk in accordance with the Presbytery's data security breach management procedure.

12. SUBJECT ACCESS REQUESTS

Data subjects can make a subject access request to find out what information is held about them. This request must be made in writing. Any such request received by Presbytery should be forwarded immediately to the Presbytery Clerk, who will coordinate a response within the necessary time limit (30 days).

It is a criminal offence to conceal or destroy personal data that is part of a subject access request.

13. DATA SUBJECT RIGHTS

Data subjects have certain other rights under the GDPR. This includes the right to know what personal data the Presbytery processes, how it does so and what the legal basis is for doing so.

Data subjects also have the right to request that Presbytery correct any inaccuracies in their personal data, and erase their personal data where we are not entitled by law to process it or it is no longer necessary to process it for the purpose for which it was collected. Data should be erased when an individual revokes their consent (and consent is the basis for processing); when the purpose for which the data was collected is complete; or when compelled by law.

All requests to have personal data corrected or erased should be passed to the Presbytery Clerk, who will be responsible for responding to them.

14. CONTRACTS

If any processing of personal data is to be outsourced from Presbytery, we will ensure that the mandatory processing provisions imposed by the GDPR will be included in the agreement or contract.

15. POLICY REVIEW

Presbytery will be responsible for reviewing this policy from time to time and updating members in relation to its data protection responsibilities and any risks in relation to the processing of data.

APPENDIX 1: Data Protection Policy

Style Presbytery Privacy Notice - General

The Presbytery of Fife : SC050563

Purpose of this Notice

This Privacy Notice outlines the way in which the Presbytery will use personal information provided to us. Personal information includes any information that identifies you personally, such as your name, address, email address or telephone number.

The Presbytery recognises the importance of your privacy and personal information and we have therefore outlined below how we collect, use, disclose and protect this information. The Presbytery is the data controller, because we decide how your data is processed and for what purpose. Contact details for us are provided below.

How we use information

We use the information you give to us:

- To administer membership records;
- For pastoral care purposes;
- For the general oversight of Church of Scotland congregations within the Presbytery;
- In relation to participation in Presbytery activities including the training and supervision of ministers, candidates for the ministry and probationers;
- To provide you with information about news, events, and activities within the Presbytery or the wider Church of Scotland;
- To fulfil contractual or other legal obligations;
- To manage our employees;
- To further our charitable aims, for example through fundraising activities;
- To maintain our accounts and records (including the processing of Gift Aid applications);
- If CCTV is in place we have this for the prevention and detection of crime.

Disclosure of information

Presbytery will only share your personal information where this is necessary for the purposes set out above. Information will not be shared with any third party outwith the Church of Scotland without your consent unless we are obliged or permitted to do so by law.

Basis for processing personal information

The Presbytery processes your information in the course of its legitimate activities, with appropriate safeguards in place, as a not-for-profit body with a religious aim and on the basis that our processing relates solely to members, former members or people who have regular contact with us, and that this information is not disclosed to any third party without your consent. We also process information where this is necessary for compliance with our legal obligations; where processing is necessary for the purposes of our legitimate interests and such interests are

not overridden by your interests or fundamental rights and freedoms; and where you have given consent to the processing of your information for a particular purpose.

Storage and security of personal information

The Presbytery will strive to ensure that personal information is accurate and held in a secure and confidential environment. We will keep your personal information for as long as you are a member or adherent of a congregation within the Presbytery or have regular contact with us or so long as we are obliged to keep it by law or may need it in order to respond to any questions or complaints or to show that we treated you fairly. We may also keep it for statistical purposes but if so we will only use it for that purpose. When the information is no longer needed it will be securely destroyed or permanently rendered anonymous.

Getting a copy of your personal information

You can request details of the personal information which the Presbytery holds about you by contacting us using the contact details given below.

Inaccuracies and Objections

If you believe that any information the Presbytery holds about you is incorrect or incomplete, or if you do not wish your personal information to be held or used by us, please let us know. Any information found to be incorrect will be corrected as quickly as possible.

You have the right to object to our use of your personal information, or to ask us to remove or stop using your personal information if there is no need for us to keep it. There may be legal or other reasons why we need to keep or use your data, but please tell us if you think that we should not be using it.

If we are processing your data on the basis of your explicit consent, you can withdraw your consent at any time. Please contact us if you want to do so.

Contact us

You can contact us by getting in touch with the Presbytery Clerk (or Depute Clerk) at:

The Presbytery of Fife
Presbytery Office
Wellesley Centre, Wellesley Parish Church
Wellesley Road, Methil, KY8 3PE
Tel: 07340461921

How to complain

You have the right to complain to the Information Commissioner's Office about anything relating to the processing of your personal information by the Presbytery. You can contact the ICO via its website at www.ico.org.uk or at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

APPENDIX 2: Data Protection Policy

Style Presbytery Privacy Notice - Employees

The Presbytery of Fife : SC050563

Purpose of this Notice

This Privacy Notice outlines the way in which the Presbytery will use personal information provided to us. Personal information includes any information that identifies you personally, such as your name, address, email address or telephone number.

The Presbytery recognises the importance of your privacy and personal information and we have therefore outlined below how we collect, use, disclose and protect this information. The Presbytery is the data controller, because we decide how your data is processed and for what purpose. Contact details for us are provided below.

How we use information

The Presbytery collects and processes your personal data for employment purposes. Processing employee data allows the Presbytery to:

- Run recruitment processes, including promotion processes
- Maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency) and records of contractual and statutory employee rights
- Operate and keep a record of disciplinary and grievance processes in order to ensure acceptable conduct within the workplace
- Operate and keep a record of employee performance and related processes in order to plan for career development, succession planning and workforce management
- Operate and keep a record of absence and absence management procedures in order to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled
- Obtain occupational health advice in order to ensure compliance with duties in relation to individuals with disabilities, comply with health and safety law and ensure that employees are receiving pay or other benefits to which they are entitled
- Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave) in order to allow effective workforce management, ensure compliance with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled
- Ensure effective business administration;
- Provide references on request for current or former employees
- Respond to and defend against legal claims and
- Maintain and promote equality in the workplace.

What personal data is collected

The Presbytery collects and process a range of information about you. This includes:

- Name, address, date of birth, gender and contact details (including email address and telephone number);
- The terms and conditions of your employment;
- Your qualifications, skills, experience and employment history, including start and end dates of previous employment and employment within the organisation;
- Information about remuneration, including entitlement to benefits such as pensions, childcare vouchers or insurance cover;
- Your bank account and national insurance number;
- Information about your marital status, next of kin, dependants and emergency contacts;
- Information about your nationality and entitlement to work in the UK;
- Information about any criminal record you may have;
- Details of your schedule (days of work and working hours) and attendance at work;
- Details of periods of leave taken by you including holiday, sickness absence, family leave and sabbaticals and the reasons for the leave;
- Details of any disciplinary or grievance procedures in which you have been involved including any warnings issued to you and related correspondence;
- Assessments of your performance including appraisals, performance reviews/ratings, training you have participated in, performance improvement plans and related correspondence;
- Information about medical or health conditions including whether or not you have a disability for which the organisation needs to make reasonable adjustments;
- Details of trade union membership; and
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

Some of this data is special category (sensitive) personal data and additional safeguards are therefore put in place to protect this data further. Special category data is defined as racial/ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health data, genetic data, biometric data, sex life, sexual orientation.

The information source

The information is collected in a variety of ways. Some information is collected directly from you. Other sources can include: third parties for references, PVG checks with Disclosure Scotland, application forms, CVs or resumes, passport or other identity documents such as driving licence, forms completed by you at the start of or during employment, from correspondence with you or through interviews, meetings or other assessments.

The Presbytery may also collect personal data about you from third parties, such as references supplied by former employers and, where applicable, information from criminal records checks permitted by law.

The lawful basis for processing

The lawful basis for processing for employment purposes is UK GDPR Article 6(1)(b) *“processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”*.

There are some aspects of processing where the lawful basis is UK GDPR Article 6(1)(c) *“processing is necessary for compliance with a legal obligation to which the controller is subject”*. This is in relation to checking an employee’s right to work in the UK, tax deduction, health and safety and criminal records check/PVG to ensure that individuals are permitted to undertake the role in question.

Where special category (sensitive) personal data is involved, the lawful basis for processing is UK GDPR Article 9(2)(b) *“processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by domestic law or a collective agreement pursuant to domestic law providing for appropriate safeguards for the fundamental rights and the interests of the data subject”*.

Who the information is shared with:

Your information will be shared internally, including with members of the Presbytery, your line manager and the National Office.

The Presbytery may share your data with third parties in order to obtain pre-employment references from other employers and obtain necessary criminal records checks from Disclosure Scotland.

How long the personal data is held for

The Presbytery will hold your personal data for the duration of your employment. The periods for which your data is held after the end of employment are set out in the Retention and Disposal Schedule available here as a separate policy.

Individuals’ rights in relation to this processing

Under data protection laws, individuals have a number of rights in relation to the processing of their personal data. These rights are as follows:

- The right to be informed – this privacy notice meets that right.
- The right of access – this means you have the right to have access or receives copies of personal data held by the organisation.
- The right to rectification – this means you have the right to correct incomplete or inaccurate data held about you.
- The right to erasure – this means you have the right to have your data deleted from an organisation’s records.
- The right to restrict processing – this means you have the right to restrict processing. This right is normally used with other rights, e.g. rectification.
- The right to data portability – this means you have the right to request your data in a machine-readable format (e.g. a .csv file) and transfer this to another organisation.
- The right to object – this means you have the right to object to how your data is processed.

- Rights in relation to automated individual decision making, including profiling – the Church does not carry out this type of processing.

Not all rights apply, and it depends on the lawful basis as to which rights do apply. For the processing purposes of this privacy notice, the right to object does not apply. All other rights do apply. If you wish to exercise any of your rights please contact the Data Protection Coordinator for the Presbytery by contacting the Presbytery Office (fife@churchofscotland.org.uk) and your request will be processed accordingly.

Complaints

If you are concerned about how your personal data is being used by Presbytery, please contact - in the first instance - the Data Protection Coordinator for the Fife Presbytery via the Presbytery Office (fife@churchofscotland.org.uk).

You can contact us by getting in touch with the Presbytery Clerk (or Depute Clerk) at:

The Presbytery of Fife
 Presbytery Office
 Wellesley Centre, Wellesley Parish Church
 Wellesley Road, Methil, KY8 3PE
 Tel: 07340461921

Complaints to the UK Information Commissioner’s Office (ICO)

If you are not satisfied with the outcome of your complaint to the Presbytery, a referral can be made to the UK regulator of data protection, the Information Commissioner’s Office (ICO).

The ICO has guidance on their website: <https://ico.org.uk/your-data-matters/raising-concerns/>

The ICO can be contacted by email casework@ico.org.uk or by telephone on 0303 123 1113.

Alternatively, their postal address is:

Customer Contact: Information Commissioner's Office
 Wycliffe House
 Water Lane
 Wilmslow
 SK9 5AF

Further information

If you would like further information in relation to this Privacy Notice please contact Fife Presbytery Data Protection Officer.

This Privacy Notice may be updated from time to time to reflect changes in legal requirements or other operational reasons. The latest version will always be available from the Presbytery Office.



SC050563

Data Retention Policy

February 2026

The next review is due: February 2027



The Church of Scotland

DATA RETENTION POLICY – WHAT TO KEEP

1. INTRODUCTION

Church of Scotland congregations gather personal information from individuals and external organisations as well as generating a wide range of personal data, all of which is recorded in documents and records, both in hard copy and electronic form.

Examples of the types of information accumulated and generated are set out in Appendix 1 of this policy and include but are not limited to minutes of Presbytery meetings; membership rolls; employment records; newsletters and other communications such as letters and emails.

In certain circumstances it will be necessary to retain documents to meet legal requirements and for operational needs. Document retention is also required to evidence agreements or events and to preserve information.

It is, however, not practical or appropriate for congregations to retain all records. Additionally, data protection principles require information to be as up to date and accurate as possible. It is therefore important that congregations have in place systems for the timely and secure disposal of documents that are no longer required.

This Data Retention Policy will be implemented on a day-to-day basis, and reviewed as required.

2. ROLES AND RESPONSIBILITIES

Members of Presbytery, including all employees, will familiarise themselves with the retention and disposal guidance attached as Appendix 1 of this policy and strive to keep records up to date.

Advice will be obtained from the Presbytery Clerk, who in turn will liaise with the Law Department or Safeguarding Department of the National Offices if there is uncertainty about retention periods.

3. RETENTION AND DISPOSAL DECISIONS

Decisions relating to the retention and disposal of data should be guided by the appendix schedule, which provides guidance on both statutory and recommended minimum retention periods for specific types of records.

If the retention period has passed for a specific document or category, careful consideration should be given to the method of disposal.

Documents containing confidential or personal information should be disposed of either by shredding or by using confidential waste bins or sacks. Such documentation is likely to include financial details, contact lists with names and addresses, and pastoral information.

Documents other than those containing confidential or personal information should be disposed of by recycling, where possible.

4. DISPOSAL OF ELECTRONICALLY STORED MATERIAL

Electronic communications including email, Facebook pages, and other social media accounts etc and all information stored digitally should also be reviewed regularly.

If no longer required, electronically stored data should be deleted and/or closed so as to be put beyond use. Archiving is not the same as deletion.

Electronic information will be deemed to be put ‘beyond use’ if the Presbytery, its office bearers and members are not able to, or will not attempt to, use it to inform any decision, or in respect of any decision, or in a manner that affects an individual in any way and does not give any other organisation access to it.

Deletion can also be effected by using one of the following methods of disposal:

- Using secure deletion software which can overwrite data
- Using the function of “restore to factory settings” (where information is not stored in a removeable format)
- Sending the device to a specialist who will securely delete the data.

APPENDIX 1: Data Retention Policy

Data Retention Schedule

This Schedule is provided as a guide to common types of documents, but is not exhaustive.

NOTE: There may be an historic interest in Presbytery Records. Avoid retaining information if there is no reason for doing so. Consult with the Law Department if you are unsure.

RECORD	RETENTION PERIOD
Minutes of meetings	6 years
Pre-employment enquiries/applications/notes/letters/references	6 months after completion of recruitment (unless data to be retained for a future similar opportunity, in which case 1 year)
Employee/appointments records including: contracts, time records etc	Duration of employment + 7 years
Pension plans and retirement records	Permanent
Salary schedules; ranges for each job description	2 years
Payroll Records	Minimum 7 years, no maximum
Contracts	7 years following expiration
Safeguarding Records	100 years
Volunteer records	Duration of placement + 7 years
Databases for mailing lists/distribution	Reviewed annually, delete out of date information
Miscellaneous contact information	Delete once there is no longer a requirement to hold such information
Documents relating to litigation or potential litigation	Until matter is concluded plus 7 years
Hazardous material exposures	30 years
Injury and Illness Incident Reports (RIDDOR)	5 years
Fixed Asset Records	Permanent
Application for charitable and/or tax-exempt status	Permanent

RECORD	RETENTION PERIOD
Sales and purchase records	5 years
Resolutions	Permanent
Audit and review workpapers	5 years from the end of the period in which the audit or review was concluded
OSCR filings	5 years from date of filing
Records of financial donations	7 years
Most financial records	7 years
Annual audit reports and financial statements	Permanent
Annual plans and budgets	2 years
Insurance claims/ applications	Permanent
Insurance contracts and policies (Directors and Officers, General Liability, Property, Workers' Compensation)	Permanent
Property/buildings documentation (including loan and mortgage contracts, title deeds)	Permanent
Warranties	Duration of warranty + 7 years
Records relating to potential, or actual, legal proceedings	Conclusion of any tribunal or litigation proceedings + 7 years



SC050563

Equality, Diversity and Inclusion Policy

February 2026

The next review is due: February 2027



The Church of Scotland

EQUALITY, DIVERSITY AND INCLUSION POLICY

1. INTRODUCTION

The Church of Scotland seeks to inspire the people of Scotland and beyond with the Good News of Jesus Christ through enthusiastic worshipping, witnessing, nurturing and serving communities.

In pursuit of this purpose, Fife Presbytery is committed to encouraging equality, diversity and inclusion and wants every member, volunteer and employee to feel respected and able to give their best.

2. COMMITMENT

In adopting the policy, the Presbytery commits to:

- Providing an environment of equality, fairness and respect for all of our members, volunteers and workers, whether temporary, part-time or full-time;
- Not unlawfully discriminating on grounds of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation;
- Opposing all forms of unlawful discrimination including in recruitment, pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, promotion, training or other developmental opportunities;
- Developing awareness of equality, diversity and inclusion among our volunteers and workers as a matter of good practice;
- Creating an environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all members, volunteers and workers are recognised and valued.
- Taking seriously complaints of bullying, harassment, victimisation and unlawful discrimination by volunteers and workers, members of Presbytery or those in contact with us and the wider community and any others in the course of the Presbytery's activities.

Such acts may be dealt with as misconduct through the Complaints Policy and Process ([page 11](#)). If the misconduct arises from an employed role the Presbytery's grievance and/or disciplinary procedures may be engaged and appropriate action thereunder taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, certain conduct, including sexual harassment, may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under

the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence. best.

3. TRAINING AND AWARENESS

Presbytery will:

- Make opportunities for training, development and progress available to all volunteers and employees, who will be helped and encouraged to develop their full potential.
- Review employment practices and procedures when necessary to ensure fairness and adherence to legal requirements, including updating policies and/or contracts when required.
- Maintain an awareness of the make-up of our membership and workforce in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in this equality, diversity and inclusion policy.

4. REVIEW

Presbytery will also assess how the equality, diversity and inclusion policy is working in practice, reviewing it annually and considering and acting to address any issues.

In the event that a member, volunteer or employee considers that this policy is not being honoured, their first point of contact should be the Presbytery Clerk.



SC050563

Financial Management Policy

February 2026

This policy should be reviewed annually

The next review is due: December 2026



The Church of Scotland

FINANCIAL MANAGEMENT POLICY

1. GENERAL STATEMENT OF PRINCIPLES

It is the policy of Presbytery to operate its finances with openness and transparency. The trustees will always, as far as reasonable, provide church members with the information that they require to understand the operation of the church's finances. To facilitate this, they will provide annual budgets, reports and regular updates on the presbytery's financial position.

This policy sets out the financial policy and procedures. If there is any perceived conflict between this and the governing documents, then the governing documents will always take precedence. It is also the trustees' intention that this policy should reflect the requirements of charity legislation, the good practice recommended by OSCR and any external advisors appointed. If there is any conflict between these policies and legislative or professional advice received, then that advice will take precedence.

An additional Risk Assessment, which is updated annually, is included as an appendix to the Policy.

2. RESPONSIBILITIES AND AUTHORITY LIMITS

2.1 - TRUSTEES

The members of Presbytery include all Ministers inducted to charges within the bounds of Presbytery on their induction, and other ordained Ministers living within or working within the Presbytery may become members. Each congregation nominates a Representative Elder to be appointed by Presbytery as a Commissioned Elder. Equalizing elders are appointed by Presbytery and chosen because of their experience or skills. All Presbytery trustees will act independently, taking account of any advice they have received, and will always act in the best interests of the Presbytery.

The members of Presbytery are responsible for agreeing an annual budget.

The treasurer will produce annual accounts detailing the income and expenditure of Presbytery, which will be approved by Presbytery. These will be made available to Presbytery members or others on request.

Presbytery will appoint an appropriate person to independently examine the annual report, records and financial management procedures each year.

Presbytery will abide by the OSCR's reporting requirements, submitting the required documents within 9 months of the financial year end.

2.2 - TREASURER

The Treasurer will be appointed by Presbytery. The Treasurer will be responsible for:

- a) The day-to-day management of Presbytery finances, including ensuring that income and expenditure are recorded, appropriate financial records are kept, and the paid staff follow the finance policy and procedures correctly;
- b) Regular reporting of the financial position of Presbytery to the members and the preparation of the annual accounts and related reports;
- c) Ensuring that an annual budget is prepared for approval by Presbytery at the November meeting;
- d) Ensuring that congregational accounts are appropriately attested each year, with any necessary comments/adjustments advised to congregational treasurers;
- e) Sharing information and best practice with congregational treasurers as required.

The Treasurer will ensure that there is a satisfactory audit and risk management regime in place, and will ensure that the Presbytery members are made aware of any material risk or shortfalls that may arise.

The Treasurer will be the person to whom members will refer any concerns or complaints about the operation of the Presbytery finances, or if they perceive that there has been a conflict of interest. In the case of any such referral, the Treasurer may convene a meeting of the Finance committee of the Board of Management, who will investigate any such concern or complaint.

The Treasurer will receive the annual report of the independent examiner of the Presbytery accounts, and any report on the control procedures in use. An action plan will be developed with the trustees. Serious concerns will always be shared with the Presbytery members as appropriate.

2.3 - PRESBYTERY STAFF AND OTHER VOLUNTEERS

The Presbytery bookkeeper will work under the guidance of the Treasurer and is responsible for:

- i. Maintaining records of income and expenditure
- ii. Processing payments for approval as required
- iii. Preparing reports for the Treasurer as required
- iv. Issuing invoices for Presbytery Dues and monitoring receipt of same

All expenditure requires to be approved by two signatories to the bank account. This can be the bookkeeper and one other signatory.

The Finance Team, made up of volunteers who have suitable experience with charity accounting, will work alongside the Treasurer to assist in the attestation of congregational accounts and assist with other matters as required.

The members have the right to question the trustees, the Treasurer, and the Presbytery staff with responsibility for finance about the conduct of the Presbytery finances. If there are any concerns

about how the trustees are operating the Presbytery financial policies, these should be raised in the first instance with the Treasurer.

3. CONFLICT OF INTEREST

The trustees of the Presbytery of Fife have a legal responsibility to act in the best interests of the charity. Conflicts of interest must be managed appropriately.

A separate Conflict of Interest Policy is available in this policy booklet ([page 15](#)) or by contacting the Presbytery Clerk.

4. OPERATION OF BANK ACCOUNT

The trustees may open bank accounts with reputable financial institutions to hold the funds of the church.

The principal location for the Presbytery's day-to-day funds will be in a current account held at the present time with Bank of Scotland.

All bank transactions – cheques, standing orders, direct debit, online payments – must be authorised by two people. Blank cheques must not be pre-signed by any signatory in any circumstance.

Each payment must be accompanied by the appropriate documentation and recorded on the Presbytery's financial management system by the bookkeeper.

The Presbytery's reserves can be held in interest-bearing deposit accounts with a recognised bank. Such reserves will be held in cash or other liquid investments realisable within a period of no more than three months. The level of reserves required is set at one year's salary for all paid staff and consultants.

There will be up to five signatories to the Presbytery's current accounts and any two of these signing together will be adequate authority. For online facilities, there are two required authorisers: one to action the payment and the second to approve the payment.

No person may authorise a payment to either themselves or a person connected to them. A connected person is defined as a spouse or partner, child, siblings, a brother- or sister-in-law, parents, grandparents, grandchildren, or business partner.

The current account should be reconciled monthly, with the reconciliation reviewed by the Treasurer (or in the absence of the Treasurer the Finance Convenor) for its completeness and accuracy.

5. GIFTS AND HANDLING OF CASH

Unlike congregations, Presbytery does not ordinarily receive cash donations, or take collections. Monies are normally received by standing order, bank transfer or cheque.

However, we recognise the importance of having controls in place to manage situations when gifts are received in the away of cash donations.

Should a cash donation be made to a trustee directly, which is for the purposes of Presbytery funds, the trustee should record the date, the amount received and the donor's name, and issue a receipt. Where possible, the trustee should have this checked and signed by a second person. The Presbytery Clerk and the Presbytery Treasurer should be notified immediately, and at the earliest opportunity the monies should be presented to the Presbytery Treasurer, who will arrange for the monies to be banked, ideally within 24 hours.

It is a conflict of interest for any trustee to offer or accept any bribe (gift, loan, payment, reward) to gain a commercial or personal advantage, or for the advantage of Presbytery. More detailed information is in the Bribery and Procurement Policy ([page 1](#)).

Presbytery does not hold Petty Cash.

6. EXPENSES

6.1 – STAFF EXPENSES

The Presbytery shall reimburse all reasonable expenses that have been wholly, necessarily, and exclusively incurred by staff in the proper performance of their duties, provided that they fully comply with this policy.

Expenses should be reclaimed by completion of an expenses form, to be authorised by the Line Manager and Treasurer or Finance Convenor and passed to the bookkeeper for payment.

Employees who are required to travel on Presbytery matters will have their reasonable expenses reimbursed. No reservation for overnight accommodation may be made without the consent of the Line Manager and the Treasurer, who will consider whether an overnight stay is necessary.

All travel on Presbytery matters must be at the economy rate appropriate to the relevant means of transport. No air travel may be reserved without the express prior written consent of the Line Manager and Treasurer. Train fares should be at off-peak times where possible.

Employees may claim for using their own car on Presbytery matters, but not between their home and the contracted place of work (usually the Presbytery Office), at a mileage rate agreed at the time of employment.

6.2 – VOLUNTEER EXPENSES

Costs will be reimbursed to volunteers when incurred on behalf of the Presbytery. Such claims should be made by sending details to the Treasurer, who will authorise payment by the bookkeeper. Prior approval in principle is required for expense claims above £100.

The Presbytery does not reimburse travel expenses for volunteers.

6.3 – GENERAL INFORMATION

If staff or volunteers are uncertain as to whether an expense will be reimbursed, clarification should be sought from the Treasurer in advance.

Claims for expenses must be submitted promptly or as soon as practicable after the expense has been incurred. Expenses should be submitted no later than the end of the month following the month in which the expense has been incurred.

Expense claims must include a full receipt, not just a total. Where the receipt has been mislaid, the Treasurer may accept an image showing a card payment of the total and the merchant, but this will not be accepted on a regular basis.

Expenses claimed will be reviewed by the Treasurer as part of the monthly check of the bank reconciliation.

For the avoidance of doubt, no-one shall authorise or process their own expenses claim.

Any attempt to knowingly claim expenses by staff or volunteers in breach of this procedure or any guidelines issued by the church will result in action being taken using the relevant disciplinary procedure.

7. HOSPITALITY, DONATIONS AND BRIBERY

Bribery is a criminal offence. The Presbytery of Fife prohibits any form of bribery. We require everyone connected with our activities to comply with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us, and we have a zero-tolerance attitude towards corrupt activities of any kind, whether committed by our employees or by third parties acting for or on behalf of the Presbytery of Fife.

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe (i.e. a gift, loan, payment, reward or advantage, either in cash or any other form of inducement) to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Presbytery of Fife or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

If we suspect that a member of staff has committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against the member of staff which may result in their dismissal, or the cessation of our contractual arrangements with a company.

If anyone suspects that an act of bribery or attempted bribery has taken place, they are expected to report this to the trustees. They may be asked to give a written account of events.

The Presbytery of Fife realises that the giving and receiving of small gifts and occasional hospitality as a reflection of friendship or appreciation, where nothing is expected in return, may occur. This does not constitute bribery where it is proportionate. However, all gifts with a value more than £35 must be reported to the trustees and recorded.

A full Bribery and Procurement Policy is available within this policy handbook ([page 1](#)) or from the Presbytery Clerk.

APPENDIX 1: Financial Management Policy

Presbytery Risk Assessment Register

Nature of Potential Risk	Importance of Risk (1 - 5)	Probability of Risk (1 - 5)	Total Score	Existing Controls	Action Required to put control in place of enhance existing controls	Responsible Officers	Last Review Date	Next Review Date
The risk of fraud/theft	4	1	5	<ul style="list-style-type: none"> • Documented Procedures for all financial processes • Bank reconciliations carried out monthly • Annual examination by independent examiners • Monthly reporting to Board of Management • Two signatures/approvals required for all payments • No Cash handled 	<ul style="list-style-type: none"> • Document Financial Processes • Ensure finance team is familiar with agreed processes • Ensure Bookkeeper familiar with agreed processes 	<ul style="list-style-type: none"> • Treasurer • Bookkeeper • Board of Management 	Dec-25	Dec-26
Unanticipated significant decrease in income	5	2	7	<ul style="list-style-type: none"> • Monitor payment of Presbytery Dues • Chase late payment • Keep aware of Cof S proposals re Presbytery Funding • Regular Reporting • Reserves Policy 		<ul style="list-style-type: none"> • Treasurer • Bookkeeper • Board of Management 	Dec-25	Dec-26
Unanticipated significant increase in expenditure	3	2	5	<ul style="list-style-type: none"> • Careful budgeting • Reasonable contingency provisions • Appropriate approval procedures 		<ul style="list-style-type: none"> • Treasurer • Board of Management 	Dec-25	Dec-26
Reduction in Investment Interest	1	3	4	<ul style="list-style-type: none"> • Keep Under Review • Switch Funds if appropriate 		<ul style="list-style-type: none"> • Treasurer • Board of Management 	Dec-25	Dec-25
Inaccurate Accounting	3	2	5	<ul style="list-style-type: none"> • Regular Reporting to Board of Management • Appointment of suitable accounting personnel 		<ul style="list-style-type: none"> • Finance Convenor 	Dec-25	Dec-26
Loss of Treasurer/Bookkeeper	5	5	10	<ul style="list-style-type: none"> • Ensure temporary cover in place for essential duties until post filled • Ensure bank access maintained 	<ul style="list-style-type: none"> • Check sufficient bank signatories in place at all times to cover emergencies 	<ul style="list-style-type: none"> • Finance Convenor • Presbytery 	Dec-25	Dec-26



SC050563

Health and Safety Policy

February 2026

The next review is due: February 2027



The Church of Scotland

HEALTH AND SAFETY POLICY

1. INTRODUCTION

Under Health & Safety legislation, all employers with five or more employees are required to have a written statement of their health and safety policy. There is no statutory prescription as to the content of the policy, but the need for and the terms of such a policy are intended to ensure that the employer has a clearly defined understanding of what its health and safety responsibilities and goals should be.

Fife Presbytery, and subsequently the trustees, are responsible for having a Health and Safety Policy in place, and this is the Policy Statement of Fife Presbytery. The general policy is to:

- Provide adequate control of the health and safety risks arising from all of the Presbytery's activities;
- Consult with employees and any other relevant persons on matters affecting their health and safety;
- Provide and maintain safe and appropriate equipment;
- Ensure safe handling and use of substances;
- Provide information, instruction and supervision for employees, where required;
- Ensure all employees are competent to do their tasks, and to give them adequate training, if necessary;
- Prevent accidents, so far as reasonably possible;
- Maintain safe and healthy working conditions and premises

2. RESPONSIBILITIES AND RISK ASSESSMENT

Responsibility for health and safety matters rests with Business Committee and the Presbytery Clerk.

A nominated person will carry out regular risk assessments, in particular in relation to Presbytery Meetings (Appendix A of this policy), ensuring potential risks are minimised, and steps are taken to ensure a safe environment for meetings.

When carrying out a risk assessment, a widely accepted and easy to follow five-step model for carrying out and reviewing risk will be followed, the steps are as follows:

- Identify the hazards
- Decide who might be harmed
- Evaluate risk
- Record significant findings
- Review

The Presbytery Clerk shall be responsible for dealing with health and safety matters arising on a day-to-day basis. Employees, volunteers and those using the Presbytery Office should take appropriate steps to protect their own health and safety and all potential risks or concerns should be reported to the Presbytery Clerk, and Wellesley Centre management, as soon as possible.

Employees will be asked to complete a Display Screen Equipment (DSE) workstation checklist (<https://www.hse.gov.uk/pubns/ck1.pdf>). This will be provided by the Presbytery Clerk and should be returned to them for filing.

3. ACCIDENTS AND FIRST AID

All employees based at the Presbytery Office will be made aware of the location of the first aid facilities during their induction training.

All employees who work from the hot desk facilities, volunteers, members, and visitors to the Presbytery Office are encouraged to familiarise themselves with the location of first aid facilities.

All accidents and cases of work-related ill health will be recorded in an Accident Book. The book is kept by the Presbytery Clerk.

The Presbytery Clerk is responsible for reporting accidents to the Health & Safety Executive under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (“RIDDOR”), where there is an obligation to do so.

4. TRAINING

All employees will be given health and safety information as part of their induction. As part of this they should be familiar with:

- Location of toilet and wash room facilities
- Kitchen or drinking water availability
- Fire exits and fire evacuation procedure
- First aid box and how to alert emergency personnel if necessary
- Health and Safety at Work Poster placement
- Accident Report book

In addition, Presbytery encourages all employees, volunteers, and members to make use of the induction and training material available in General Trustees Health and Safety Toolkit <https://www.churchofscotland.org.uk/about-us/our-structure/building-and-property-resources/general-trustees-health-and-safety-toolkit>

Appendix A - Fife Presbytery: Risk Assessment for Presbytery Meetings

This document is based on the Church of Scotland, Integrated Risk Assessment as a guide for churches to create an integrated risk management approach. The Risk Assessment pro forma has been designed to help congregations, and Presbyteries identify the appropriate control measures that should be in place to protect members, volunteers, employees and visitors from risks associated with using Church buildings.

It is the responsibility of Fife Presbytery to ensure that there are suitable and sufficient arrangements in place to comply with health and safety legislation (Health and Safety at Work Act 1974). Further guidance on the roles and responsibility of Presbyteries/Kirk Sessions towards health and safety can be found in the Church of Scotland Health and Safety Toolkit (<https://www.churchofscotland.org.uk/about-us/our-structure/building-and-property-resources/general-trustees-health-and-safety-toolkit>)

Which building(s) does this risk assessment relate to?	Wellesley Church Hall and Sanctuary, Offices, including Main Hall, Meeting Rooms, Linking Corridors and ancillary facilities
Name of assessor(s)	W Sweenie
Date	2 nd February 2026
Date of review	31 st January 2027 (or sooner in the event of a major change in circumstance)
Signature	

To quote from the Church of Scotland Law Department circular –

In most cases all that is required is the application of “common sense”: If there is a safety risk, then it is likely that it will be obvious to the layman and the solution should be equally self-evident.

What is the Hazard?	What is the Risk identified?	Who might be harmed and how?	What Control measures/ safeguards need to be in place?	What further actions is required to control risk?	Who is responsible for taking action
<p>Slips, Trips and Falls</p> <p>Spillages</p>	<p>Injury caused by slipping or tripping.</p>	<p>Attendees at the Presbytery meeting may suffer injuries such as fractures or bruising if they slip on spillages or trip over objects.</p>	<ol style="list-style-type: none"> 1. Good lighting in all rooms, halls and corridors. 2. Mats at entrances to stop rain water being carried in. 3. Any spillages reported and cleared up immediately 4. Ensure that those with special needs are helped to negotiate steps and/or other obstacles within the building. 	<p>All additional risks need to be identified on the day to ensure that there are no new hazards, such as defective lighting, spillages or inappropriately stored objects.</p> <p>No chairs or other objects to be placed in fire exit routeways.</p>	<p>Those given responsibility for initially setting up the hall.</p> <p>Checked by H&S Rep PC CO</p>
	<p>Injury caused by trailing wires and/or electrical cables.</p>	<p>Attendees at the Presbytery meeting may suffer injuries such as fractures or bruising if they trip over trailing wires / cables.</p>	<ol style="list-style-type: none"> 1. Ensure there are no trailing wires and/or electrical cables which could cause anyone to trip over. 2. Avoid stretching cables across walkways if possible. Where not possible, all cables will be laid flat on the floor and cable covers/hazard tape used. 3. Ensure the floor is kept clear of cables or other materials in such a way that they can't cause a trip hazard. 4. Power for any amplification or sound system should be taken from electrical sockets where they will not involve trailing cables and a trip hazard. 	<p>All additional risks need to be identified on the day to ensure that there are no new hazards, such as defective lighting making trip hazards difficult to spot.</p> <p>Extension leads may constitute a tripping hazard and their use should be kept to a minimum.</p> <p>Extension leads and socket outlets are not to be overloaded, and reel-type extension leads are to be fully unwound to prevent overheating.</p>	<p>Those given responsibility for initially setting up the hall.</p> <p>Checked by H&S Rep PC CO</p>

What is the Hazard?	What is the Risk identified?	Who might be harmed and how?	What Control measures/ safeguards need to be in place?	What further actions is required to control risk?	Who is responsible for taking action
Use of projector and screen	Tripping hazard. Eye injuries.	Attendees at the Presbytery meeting may suffer injuries such as fractures or bruising if they trip over wiring from poor placement of AV equipment. Attendees at the Presbytery meeting may suffer injuries or strain to their eyes due poor placement of projection equipment.	<ol style="list-style-type: none"> 1. The projector will always be sited where it can be seen clearly. If cabling requires to trail across the floor, it will be covered either by hazard tape or cable covers. 2. The projector will always be positioned on a stable base. 3. The beam (light) will be focused away from the presenter and audience, and there will not be any possibility of anyone looking straight at it. The operator of the projector will be made aware of the dangers of looking at the beam. 	<p>Extension leads may constitute a tripping hazard and their use should be kept to a minimum.</p> <p>Extension leads and socket outlets are not to be overloaded, and reel-type extension leads are to be fully unwound to prevent overheating.</p>	<p>Those given responsibility for initially setting up the hall.</p> <p>Checked by H&S Rep PC CO</p>
Electrical safety	Electric shock from faulty equipment, damaged insulation, and fire risks.	Attendees at the Presbytery meeting.	<ol style="list-style-type: none"> 1. Ensure that all electrical equipment is inspected before use. 2. Any damaged cables must not be used. 3. Any equipment that does not appear in satisfactory visual condition should not be used. 	The Presbytery should consider PAT for all equipment used regularly at Presbytery Meetings (sound system, projector, laptop, piano keyboard).	<p>Those given responsibility for initially setting up the hall.</p> <p>Checked by H&S Rep PC CO</p>
Emergency evacuation	Attendees at Presbytery who require support in case of evacuation	Attendees at Presbytery meetings with restricted mobility and other attendees with support needs unable to	<ol style="list-style-type: none"> 1. Ensure that routes are available for wheelchair users, and those with restricted mobility, to enter and exit the building safely. 	Ensure fire exits, and access routes, are kept clear.	<p>Meeting Organiser PC Mod H&S Rep</p>

What is the Hazard?	What is the Risk identified?	Who might be harmed and how?	What Control measures/ safeguards need to be in place?	What further actions is required to control risk?	Who is responsible for taking action
		evacuate the building without support.	2. Ensure that those with support needs can be assisted to evacuate the building safely if required.	Make attendees aware of exits and assembly points.	
Difficulty of egress from building e.g. blocked routes	Attendees unable to exit the building safely without increasing the risks.	Attendees at the Presbytery meeting, not just those with mobility issues.	<ol style="list-style-type: none"> 1. In preparation for and immediately before the start of the Presbytery meeting, all designated emergency exits must be checked to ensure they are unlocked and no route is blocked. 2. Importantly – no seats or other obstacles must obscure free movement through fire exit doors. 	Be vigilant throughout the duration of the meeting to ensure that nothing is placed in the way of exit routes.	Meeting Organiser PC Mod H&S Rep CO
Difficulty in evacuating large numbers in case of an emergency	Risk of panic, serious injury or worse.	Attendees at the Presbytery meeting.	<ol style="list-style-type: none"> 1. The Organiser will appoint suitable persons to assist attendees with evacuation of hall/church in the event of an emergency. 2. Ensure all fire exits are unlocked, clear and unobscured at all times. Also ensure at the start of the event that the Organiser announces the location of all emergency exits. 3. THE FIRE ASSEMBLY POINT IS IN THE CAR PARK OUTSIDE OF THE CHURCH BUILDINGS. 	<p>Having a list of people willing to act as ‘suitable persons’.</p> <p>These people meeting with the Presbytery Clerk, H&S Rep and Compliance Officer to discuss evacuation procedure.</p>	Meeting Organiser PC Mod H&S Rep CO
Hazards from traffic in car park.	Risk of serious injury or worse.	Attendees at the Presbytery meeting.	Care must be taken when entering or leaving the Church car park, due to moving traffic.	None	All attendees

What is the Hazard?	What is the Risk identified?	Who might be harmed and how?	What Control measures/ safeguards need to be in place?	What further actions is required to control risk?	Who is responsible for taking action
Manual Handling	Back injury or muscle strain due to lifting chairs or tables incorrectly when laying out the hall for a meeting.	Those setting out for the meeting.	<ol style="list-style-type: none"> 1. The Centre's policy for the moving and handling of chairs and tables should be adhered to at all times 2. Trolley to be used to move chairs into position. 	The Wellesley Centre set out the hall for Presbytery use. If more chairs, etc., are required, then the trolleys provided should be used.	Any persons assisting with the laying out of the hall
Medical / First Aid Occurrences	Persons taking unwell or requiring emergency medical treatment	Attendees at the Presbytery meeting.	<ol style="list-style-type: none"> 1. Ensure that First Aid facilities are available and easily accessible 2. Access to a telephone to alert emergency services if required 3. A Public Access Defibrillator is located external to the main building. 	Is there a first aider on duty at Presbytery Meetings, or someone willing to be the named person in such a situation?	Meeting Organiser PC Mod H&S Rep CO

Any additional notes:

Additional comments relevant to particular meeting:



SC050563

Social Media Policy

February 2026

The next review is due: February 2027



The Church of Scotland

SOCIAL MEDIA POLICY

1. INTRODUCTION

The Presbytery of Fife welcomes the use of social media, as it provides effective ways for Presbytery and the congregations it serves to:

- Communicate instantly with members,
- Keeping members informed and updated;
- Signpost involvement across the bounds of Presbytery and beyond; and
- Forge relationships with individuals and the wider community that build trust and understanding.

Facebook, Instagram, X, and other online communication platforms have the ability to achieve these outcomes, but it is necessary to outline a few issues Presbyters should bear in mind when communicating online.

2. MANAGEMENT

Fife Presbytery will ensure that any websites and social media pages it manages are kept up to date and current.

The Church of Scotland has produced detailed guidelines⁵ for Social Media use focussing on Facebook, Instagram and X, and the Business Committee will refer to these guidelines when instructing the use of social media.

Presbytery urges all members to familiarise themselves with these guidelines in respect of their duty as trustees.

In choosing which social media platform(s) to engage with, Presbytery will take account of, and give consideration to, the audience it is trying to reach and what it is aiming to achieve, always ensuring that there are two or more people who hold the login details and passwords for any social media accounts, so as not to lose access to, or the means to close any such account.

3. IMAGES/SAFEGUARDING

When using images, Presbytery will take all possible steps to ensure they have relevant permissions, and will under no circumstances post pictures of any child under 18 without the express permission of a parent/guardian. Consult the Church of Scotland safeguarding resources for further guidance.⁶

⁵ <https://www.churchofscotland.org.uk/about-us/departments/communications-department/communication-resources/social-media-guidelines>

⁶ <https://www.churchofscotland.org.uk/about-us/safeguarding-service>

4. FACEBOOK

Facebook is the one of the most popular social networking sites worldwide and offers three options: a profile, a page, or a group.

- A profile represents a single individual and is for non-commercial use.
- A page is a timeline for organisations and businesses.
- Groups are effective in connecting family, peers, colleagues or people with a shared interest.

Fife Presbytery operates a Facebook page to enable people to find and explore the worship and mission life across Presbytery. It currently has five admins with access to the page, who can share news, events, prayers, images, and general stories from across the Church of Scotland.

The Presbytery Facebook page can be accessed here - <https://www.facebook.com/FifePresbytery>

5. OTHER SOCIAL MEDIA

Fife Presbytery does not currently (as at February 2026) operate or use any other Social Media platforms. Should it decide to do this, it will adhere to the guidelines as set out on the Church of Scotland website at the time.

6. PERSONAL VIEW SHARING

Members of Presbytery, employees and those volunteering on behalf of the Presbytery of Fife should be mindful of their status as trustees, and as Ministers, Deacons, Readers, MDS, and Elders of the Church of Scotland, and for such reasons should consider carefully before engaging with local news agencies and on social media platforms, ensuring that they consider that what they are sharing is appropriate.

7. CONFIDENTIALITY

Members should be sensitive about confidentiality and the risk of intrusion. Social media does not change our fundamental understanding about confidentiality across the whole life of the Church.

When telling a story about a situation which involves someone else, or another church or organisation, stop and consider: is this your story to tell? Would it cause distress, inconvenience, upset or embarrassment to others if they found out you had shared it this way?

If in any doubt, then it's more than likely that it's not suitable for sharing online. Advice can and should be sought from the Presbytery Clerk if you have concerns about inappropriate material shared online.

8. PRIVACY AND SECURITY

Members should be mindful of their own security when online, being careful about the personal details they share, assuming anything you share about yourself online is in the public domain. Do not assume anything electronic is secure.

You might be able to delete or recall an email but there's no guarantee the recipient will. Equally, your privacy settings on your social media tools might mean only your accepted "friends" or "followers" can see the things you say, but there is no guarantee that they will not pass them on outside your trusted circles.



SC050563

Whistleblowing Policy

February 2026

The next review is due: February 2027



The Church of Scotland

WHISTLEBLOWING POLICY

1. PURPOSE AND SCOPE

The Presbytery is committed to the principles of openness, probity and accountability. In line with that commitment, we expect anyone who has a serious concern about any aspect of our presbyterial life to voice those concerns in good faith and in line with the following procedure without fear of victimisation, subsequent discrimination or disadvantage.

The purpose of this policy is to provide a procedure that enables concerns to be raised if there are reasonable grounds for believing there is serious malpractice occurring or likely to occur. It applies to all employees, contractors, consultants, temporary casual and agency workers within the direct employ of Presbytery and the word “employee” is used in this policy to cover all such individuals. It also applies to members and corresponding members of Presbytery and the word “member” is used to cover both. Matters of concern should be raised responsibly through the procedures and guidance as detailed in this policy.

2. DEFINITION

Whistleblowing is when someone knows, or suspects, that there is some wrongdoing involving illegal and/or underhand practices occurring within the Presbytery and alerts the right person within the Presbytery, or the relevant authority, accordingly. Employees who engage in whistleblowing are, in certain circumstances, protected by the Public Interest Disclosure Act 1998.

3. GENERAL PRINCIPLES

This policy is designed to deal with concerns raised in relation to the specific issues which are in the public interest and are detailed below, and which fall outside the scope of other procedures (such as a grievance procedure).

The policy does not apply to personal grievances concerning an employee's terms and conditions of employment or other aspects of the working relationship, complaints of bullying or harassment, or disciplinary matters. Such complaints will be dealt with under existing procedures on grievance, bullying and harassment and discipline and misconduct.

The policy deals with specific concerns which are in the public interest in circumstances where an employee or a member has the reasonable belief that:

- A criminal offence has been committed, is being committed, or is likely to be committed (including financial malpractice or acts of bribery);
- A person has failed, is failing, or is likely to fail to comply with a legal obligation to which they are subject;
- The health and safety of any individual has been, is being, or is likely to be endangered;
- The Presbytery is attempting to suppress or conceal any information relating to any of the above.

If, in the course of investigation, any concern raised in relation to the above matters appears to relate more appropriately to grievance, bullying or harassment, or discipline, those procedures will be invoked. If the matter is of a less serious nature, an employee should always talk to his or her line manager in the first instance.

4. ROLES AND RESPONSIBILITIES

Concerns must be raised without malice and in good faith, and the individual must reasonably believe that the information disclosed, and any allegations contained in it, are substantially true. The disclosure must not be made for purposes of personal gain, and in all the circumstances it must be reasonable to make the disclosure.

If an employee knows, or suspects, that some wrongdoing is occurring, he or she should raise the matter immediately with their line manager. If the wrongdoing or suspected wrongdoing involves the employee's line manager, or if the concern is raised by a member, the concern should be referred to the Presbytery Clerk (or to the Convener of the Business Committee if the disclosure relates to the Presbytery Clerk in any respect). Anyone who is informed of potential wrongdoing must take immediate action to ensure the situation is investigated and dealt with as quickly as possible.

Efforts must be made to maintain the anonymity of the individual who has made the allegation of wrongdoing.

5. PROCEDURE AND PROCESS

Concerns may be raised verbally or in writing, and whilst individuals are not expected to prove beyond doubt the truth of an allegation, they will be required to demonstrate that there are reasonable grounds for their concern.

It is suggested that individuals making a disclosure should set out (One) the background and history of the concern (including relevant dates), and (Two) the reason they are particularly concerned about the situation.

Wherever possible, the person to whom the disclosure is made should write to the employee or member within ten working days with the following information:

- An acknowledgment that the concern has been raised;
- An indication of the anticipated method of investigation and resolution, if applicable;
- An estimation of how long it will take for the individual to be provided with a final response, noting that all investigations shall be completed as quickly as may be practicable in the circumstances;
- Advice as to what, if any, initial enquires have been made and what anticipated further investigations will take place.

The following process should then be followed:

- a) If an investigation is deemed to be required, the Presbytery Clerk (or Convener of the Business Committee, if appropriate) shall nominate an individual or individuals to consider the concern and take any steps they deem necessary to investigate the matter. This individual or individuals will conduct a full and thorough investigation. The form the investigation takes will be determined by the nature of the concern.
- b) The findings of the investigation will be shared with the Business Committee, which will then decide if there is a case to answer and what procedure to follow. This may include taking steps with a competent authority, such as the police, for further investigation. The decision may also be that the matter would be more appropriately handled under existing procedures for grievance, bullying and harassment, or discipline.
- c) If it is determined that it would not be appropriate to proceed with an investigation or, following initial investigation it is decided not to do so, the decision will be explained as fully as possible to the individual who raised the concern, giving the reasons not to take it further. If they are not satisfied with the decision, it is then open to the individual to make the disclosure to the Principal Clerk, who may take action if appropriate. This may include appointing an investigator, taking action under Church legislation and/or referring the matter on to another authority, such as the police or local authority.
- d) It is recommended that the Church's Law Department also be contacted so that guidance can be provided if required.
- e) If urgent action is required, this may be taken prior to an investigation being undertaken.
- f) The employee or member may be invited to one or more meetings during the investigation, depending on the nature of the matter raised, the potential difficulties involved, and the clarity of the information provided. The employee may be accompanied by a work colleague or certified trade union representative during any such meetings. A member may be accompanied by a companion of their choosing.
- g) Any other employees that are invited to provide statements should abide by the same principles as the employee or the member raising the concern.
- h) If the concern involves an employee or employees, the employee(s) will be informed of the investigation and of the evidence supporting it at an early stage, and will be provided with an opportunity to respond during the investigation.
- i) Employees and members raising concerns under this policy need to be assured that the matter has been properly addressed, so they are to be kept informed of procedural progress

and the outcome of the investigation. It may not always be appropriate to disclose the full details of any action that is taken, but the employee or member will be informed if action is taken.

6. ALERTING OUTSIDE BODIES TO A POTENTIAL WRONGDOING

Employees and members should always, in the first instance, follow this internal procedure about a potential wrongdoing. If they are not satisfied with the response, they are entitled to contact a relevant external body to express the concerns. In doing this they should:

- Have a reasonable belief that the allegation is based on correct facts;
- Not be making any personal gain from the revelations; and
- Make the disclosure to a relevant body. A relevant body is likely to be a regulatory body, and a list of prescribed relevant bodies is available at:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

Disclosures to OSCR should be made via the Church's Law Department. If an employee or a member is dissatisfied with the Presbytery's response under this policy and considers that any matter should be reported to OSCR he or she should contact the Law Department at lawdept@churchofscotland.org.uk in order to take this forward.

7. CONTACTING THE MEDIA

The media is not a relevant external body. Employees and members should never contact the media with allegations. Employees should be mindful that they must maintain the confidentiality of the employer so far as possible.

8. PROTECTION AGAINST DETRIMENT

Any employee who makes a protected disclosure in terms of the Public Interest Disclosure Act 1998 will be protected from any detriment in relation to any allegations that are made. If the employee does not follow the procedure set out above, which encompasses the requirements of the Public Interest Disclosure Act 1998, the protection against detriment may not apply.

Disclosing information in an inappropriate way (e.g. contacting the media, contacting a regulatory body without first raising the matter with the employer as set out in this policy, or contacting individuals within the Presbytery other than those office-holders named in this policy) will potentially constitute gross misconduct and could result in disciplinary action up to and including dismissal being taken against the employee.

9. REVIEW

This policy will be kept under review by the Presbytery. Any questions regarding its operation should be directed to the Presbytery Clerk in the first instance.



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