



Diocesan Complaints Procedure

Produced by the Diocesan Referrals Group

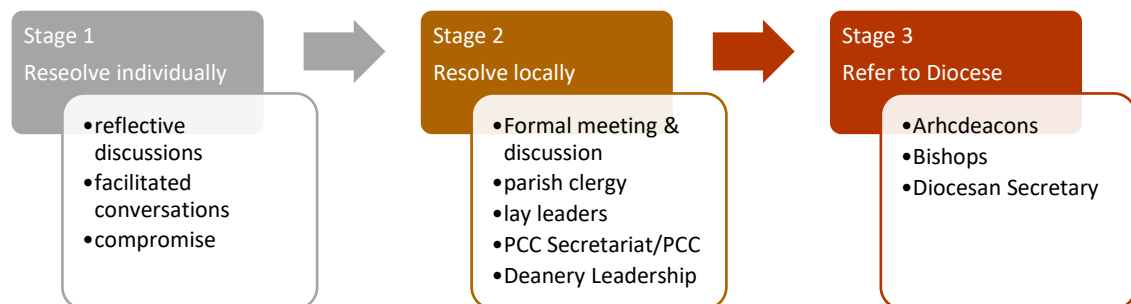
Introduction

1. This Policy sets out the various ways in which the Diocese of Southwark seeks to resolve complaints.
2. For the purpose of this procedure, a “complaint” is a written or verbal expression of dissatisfaction or disquiet about the policies and procedures, acts or omissions of a parish or Deanery within the Diocese, or any of their officers. A complaint may include an allegation that a person has behaved in an unacceptable way.
3. There are separate procedures dealing with other types of complaints:
 - **Safeguarding:** If you wish to raise a concern relating to safeguarding, please contact the Diocesan Safeguarding Team. The contact details are available at <https://southwark.anglican.org/safeguarding/>. If you suspect a person is at risk of immediate harm, phone 999.
 - **Safeguarding complaints:** If you wish to complain about the Diocese’s safeguarding functions, there is a separate policy for which can be found [here](#). Local parochial concerns, in the first instance, should follow the procedure outlined in A Safe Church (form 21) which can be found at Appendix A.
 - **Other diocesan services:** If you wish to complaint about other services provided centrally by the Diocese of Southwark, or about the actions of a diocesan employee, officer, or board or committee member, please contact the Diocesan Secretary (diocesan.secretary@southwark.anglican.org) or the relevant departmental manager. Diocesan staff should follow the grievance procedure set out in the staff handbook.
 - **Clergy misconduct:** If you wish to make a formal disciplinary complaint about serious misconduct by a member of the clergy, you will need to follow the Clergy Discipline Measure 2003 process detailed here: <https://www.churchofengland.org/about/leadership-and-governance/legal-resources/clergy-discipline>. If appropriate, you may wish to refer to this procedure as a means of seeking to resolve the complaint informally first.
 - **Diocesan Property:** There is a separate complaints policy for property services for anyone living in diocesan-managed housing.
4. This Policy covers other situations in parishes or deaneries which are primarily concerned with relationships and in a church or parish setting, rather than services provided. They may include areas such as breakdown in pastoral relationship in a church setting, bullying and harassment which are defined in the Diocesan Dignity at Work Policy¹ (see Appendix B).
5. This procedure is not a replacement for referral to the Police or other authorities and agencies where that is the appropriate course of action.

¹ As approved by Diocesan Synod in the Handbook of Governance

Principles of Resolution

6. Where possible individuals should seek to resolve any conflicts locally, informally and individually. Concerns and complaints should, therefore, be first brought direct to the person(s) deemed responsible where possible or appropriate.
7. In the event that this does not resolve the situation, it is recommended that local intervention be sought prior to submitting a Formal Complaint using this Policy. If the complaint is not satisfactorily resolved at the local level, or informally, then please use this formal procedure described below at Stage 3. The Diocese is committed to dealing effectively with any concerns or complaints raised. Where possible, we will seek to mediate and enable concerns to be resolved informally, speedily and fairly by discussion, problem-solving, and negotiation.



Formal Complaints

8. In the event that informal discussions have not proved effective you may consider making a Formal Complaint. The overriding principles are that all complaints will be:
 - Normally in writing. If telephone complaints are raised, you will be invited to put these in writing so that clear information is received/agreed with the complainant. Anonymous complaints cannot normally be followed up.
 - Responded to promptly and in compliance with Data Protection Regulations (GDPR)
 - Investigated fairly and with pastoral care and sensitivity.
 - Resolved as amicably as is possible in any situation with complainants asked where appropriate about how they would like their complaint resolved; but understanding how the decision-making processes work.
 - Reviewed, where appropriate, by the Diocesan Referrals Group which meets monthly.
 - Complaints can be made about issues of policy, action, or individual service/action by a member of clergy, lay workers, Staff or parishioner.
 - Complaints cannot be made about decisions or actions that have been taken following legal church processes, protocols, due process, and appeal processes.
 - The Diocese will not accept vexatious, threatening or intimidating complaints made about any individual. These may be referred to the statutory authorities as appropriate.
 - If a referral is made to the Diocesan Referrals Group, it could be six weeks before a response can be provided, but every effort will be made to respond earlier.

Making a complaint

9. Complaints may be sent to the appropriate people as described below and contain as much detail as possible. Before a formal complaint is made, check that Stage 1 and Stage 2 of the Principles of Resolution have been followed.

Who can make a complaint and where should it be directed?

10. Anyone in parishes or deaneries can raise a complaint. It is expected that informal conversations and measures have been exhausted prior to making a formal complaint.
11. Those affected may complain informally or formally as follows:
 - Parishioners to their Churchwarden (*this is the process in the Safe Church policy), Parish Priest, Area Dean or Archdeacon. https://southwark.anglican.org/wp-content/uploads/2021/02/21_Complaints_Procedure.docx
 - Parish employees should use the parish grievance procedure for making complaints as stipulated in https://southwark.anglican.org/wp-content/uploads/2021/02/ASC_Section_10_Forms_and_templates.pdf Appendix 22 of a Safe Church.
 - Parish Priest to their Archdeacon, Area Dean or the Chaplain to the Bishop of Southwark. The [Clergy Grievance Procedure](#) outlines the informal processes to be followed, where alternative resolution has not been effective.
 - Lay ministers, PCC Officers to their Parish priest, Archdeacon, Area Dean, Warden of Readers, or Diocesan SPA as appropriate.
12. Every effort will be made to resolve complaints informally. However, the action which will be taken in relation to complaints of bullying or harassment will also be guided by Diocesan Policies, relevant regulations and relevant legal frameworks. In exceptional cases the advice of external Legal Advisers to the Diocese will be sought.

What will happen if a complaint is received?

13. Once a complaint is received by email/letter we will endeavour to acknowledge within three working days of receipt. Where possible the acknowledgement will state what further steps may be taken, and what the complainant can expect will happen next. Complaints are varied, so it is important that each is dealt with according to issue, need, level of seriousness, further information needed, etc.
14. Where a complaint is taken by telephone, the details will be confirmed including name, address, contact details, nature of complaint – and this will be passed on to the appropriate person to call/write back to confirm the details and seek any clarification or further information that would be needed to progress the complaint.
15. Paperwork relating to all complaints received, actions taken, etc will be recorded and stored within appropriate [data protection provisions](#).

How will complaints be progressed and resolved?

16. Wherever possible complaints will be resolved amicably, professionally and with pastoral care and sensitivity. Individuals making complaints will be dealt with courteously and professionally. Information will be clarified, and any further information sought.

17. Where possible the Diocese will try to mediate and intervene informally. There may be times when further consideration including legal action, police involvement is required. These will be considered on a case-by-case basis.
18. Whether the complaint is upheld or not, the reply to the complainant will set out how the complaint was progressed and conclusions and set out how a referral can be made. As appropriate, where actions/decisions are taken in relation to a complaint these will be shared with the complainant. This will not include personal information about person/s involved.

What happens if a complainant is unhappy with the outcome of their complaint?

19. If the complainant feels that the problem has not been satisfactorily resolved, they are able to refer their complaint to the Diocesan Secretary or Diocesan Bishop.
20. After reviewing the available information, the Diocesan Secretary or Diocesan Bishop will make a final decision on any agreed outcomes or further investigation.

Reviewing this policy

21. The Diocesan Referrals Group is responsible for ensuring this policy is shared across the management structures of the Diocesan Offices and wider Diocese.
22. The Diocesan Referral Group will review this policy at least triennially. The date of the policy/policy version will be indicated at the beginning of this policy.
23. The Diocesan Referrals Group is committed to learning from each case and the information we gain will improve the way we work in future.

Version 1

1 January 2025

SOUTHWARK DIOCESAN VALUES

Adapted from the 7 Nolan Principles of Public Life for the Fit for Purpose Report 2015²

1. **Christian values** Trustees will seek to model and espouse Christlikeness and service. They will be people of prayer. They will be committed to supporting approved diocesan strategy for the furtherance of the mission of the Diocese of Southwark;
2. **Selflessness** Trustees should act solely in terms of the interests of the Church as the Body of Christ, the Diocese and the wider public. They should not **do** so in order to gain financial or other benefits for themselves, their family or their friends. They should take seriously their role as representatives, bringing parish views to meetings and reporting back to their electorate;
3. **Integrity** Trustees should not place themselves under any financial or other **obligation** to outside individuals or organisations that might seek to influence them in the performance of their official duties;
4. **Objectivity** In carrying out public business, including making public appointments, **awarding** contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit;
5. **Accountability** Trustees are accountable for their decisions and actions and must submit themselves to whatever scrutiny is appropriate to their office;
6. **Openness** Trustees should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict **information** only when the wider public interest clearly demands it;
7. **Honesty** Trustees have a duty to declare any private interests relating to their charitable, synodical or company duties and to take steps to resolve any conflicts arising in a way that protects the interest of the Diocese of Southwark, the wider Church and society;
8. **Leadership** Holders **of** public office should promote and support these principles by leadership and example.

The continued living out of these principles will embed them in our culture. It is therefore essential that when we adopt new structures, we also commit ourselves to renewed behaviour.

DIOCESE OF SOUTHWARK DIGNITY AT WORK POLICY

1. The aim of the Dignity at Work Policy is to ensure that all employees:
 - are treated with dignity and respect;
 - are able to work and flourish in an environment free from harassment on the grounds of age, gender, sexual orientation, race, religion or belief, political opinion, marital status, disability, or nationality;
 - are aware that bullying and harassment are not acceptable and will not be tolerated;
 - understand how to raise concerns about bullying and harassment.
2. **Bullying** is behaviour which humiliates or demeans the individual involved and includes persistent criticism and personal abuse, either in public or private,
3. **Harassment** is unwanted conduct related to a protected characteristic under the Equality Act³ that violates people's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. This includes third party harassment where an employer is potentially liable for harassment of employees by third parties who are not employees, where the employer fails to take reasonable steps to prevent it. Harassment is from the perspective of the recipient of the treatment, and may vary between persons.
4. **Discrimination** may take a number of forms:
 - **Direct discrimination** - treating people less favourably than others because of an applicable protected characteristic;
 - **Indirect discrimination** - applying a provision, criterion or practice which disadvantages or would disadvantage people who share an applicable protected characteristic (and disadvantages the individual complainant), and which is not justified as a proportionate means of achieving a legitimate aim;
 - **Associative discrimination** – direct discrimination against someone because they associate with another person who possesses an applicable protected characteristic.
 - **Perceptive discrimination** – discrimination against an individual because they are mistakenly perceived to possess an applicable protected characteristic.
 - **Victimisation** – subjecting someone to a detriment because they have done (or the perpetrator believes they have done or may do) a "protected act", e.g. made a formal complaint of discrimination or given evidence in a tribunal case.
5. The Diocese of Southwark will not tolerate abuse, harassment and bullying, discrimination or victimisation – however rare. All complaints of abuse, harassment, bullying, discrimination or victimisation will be taken seriously and thoroughly investigated. Persons affected by such behaviour may complain informally or formally to their line manager, to the Director of HR, to the Deputy Diocesan Secretary who has a pastoral lead for DBF employees or to the Diocesan Secretary.

³ age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, gender, sexual orientation or religion or belief, including church tradition

Diocesan Dignity at Work Policy

1. The aim of the Dignity at Work Policy is to ensure that all Clergy, Lay Ministers, Officers of the PCC, and Diocesan employees:
 - are treated with dignity and respect
 - are able to perform their roles and flourish in an environment free from harassment on the grounds of age, gender, sexual orientation, race, religion or belief, political opinion, marital status, disability, or nationality
 - are aware that bullying and harassment are not acceptable and will not be tolerated
 - understand how to raise concerns about bullying and harassment
2. **Bullying** is behaviour which humiliates or demeans the individual involved and includes persistent criticism and personal abuse, either in public or private.
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³ age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, gender, sexual orientation, or religion or belief, including church tradition

investigated.

6. Persons affected by such behaviour may complain informally or formally as follows:
 - Line Manager or to the Deputy Diocesan Secretary who has a pastoral lead for DBF employees, or to the Diocesan Secretary
 - Parish Employees to their Parish Priest or Archdeacon
 - Parish Priest to their Archdeacon, Area Dean or the Chaplin to the Bishop of Southwark
 - Lay ministers, PCC Officers to their Parish priest, Archdeacon, Warden of Readers, or Diocesan SPA as appropriate.

Every effort will be made to resolve complaints informally. However, the action which will be taken in relation to complaints of bullying or harassment will also be guided by Diocesan Policies, relevant regulations and relevant legal frameworks.

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