



# Complaints Management Policy

Policy: Complaints Management Policy

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# 1. Introduction

At City Light Church (CLC), we aim to ensure that all our activities and interactions support the mission of the church, meet the needs and expectations of church members and our community, and comply with government requirements. However, we recognise that sometimes things may not go according to plan, and that there will always be opportunities for us to improve the way we do things.

For this reason, we want to ensure that we have a system that supports people to provide feedback and make a complaint so we know when issues arise, we can address these situations promptly and effectively, and improve our systems, processes and practices as a result.

God desires that his church maintains unity, shows love for one another and those in our community. The Bible encourages us to live at peace with one another and provides a framework for addressing interpersonal conflict and concerns in church. Additionally, addressing concerns and complaints raised is an important part of loving those in our local community, increasing confidence and trust, and protecting the church.

## 1.1. Scope and Application

This policy applies to all employees (temporary, permanent and contractors) and visitors to our premises. It does not include grievances or the management of allegations. These are referenced in CLC's Disciplinary Policy.

We will continue to review and update this policy from time to time.

## 1.2. Legislation

In relation to complaints handling, charities and non-for-profit private organisations:

- Are not subject to legislation that applies to public entities, and for-profit companies, and are not within the jurisdiction of the NSW Ombudsman
- Should consider guidance material from the [Australian Charities and Not-for-profits Commission](#) (ACNC), the national regulator (see References below).

### Other References:

- Complaints-handling: model policy and procedure. Not-for-profit Law at Justic Connect promoted by the ACNC <https://www.acnc.gov.au/tools/templates/complaints-handling-model-policy-and-procedure>
- Effective Complaint Handling Guidelines. NSW Ombudsman. 2017
- Complaint Handling Guide: Upholding the rights of children and young people. National Office for Child Safety. Australian Government.
- CLC Constitution
- What the ACNC can investigate <https://www.acnc.gov.au/raise-concern/concerns-about-charities/what-acnc-can-investigate>

## 2. Definitions

**Complaint** means an expression of dissatisfaction made to or about us, our services, staff or ministry workers, where a response or resolution is expected or legally required. This could come from an internal source (e.g. staff, ministry workers, Committee members, elders or broader church members) or an external source (e.g. visitors, neighbours or external contractors).

**Dispute** is an unresolved complaint escalated either within or outside our church.

**Feedback** includes opinions, comments and expressions of interest or concern to or about us, about our services or complaint handling system where a response is not expected or legally required.

**Grievance** is a formal written statement by an individual staff member about another staff member or a work-related problem.

**Allegation** is a concern that a legal obligation has not been met in the context of church. This may include for example, an allegation of misconduct, child abuse or other form of criminal conduct.

## 3. Table of Responsibilities

| Responsibilities  | Evidence of Compliance   |
|---|--|
| <p><b>Senior Pastor</b></p> <ul style="list-style-type: none"> <li>● In line with scriptural direction, promote a culture within the church membership, staff and extended community that values feedback and complaints, and effective resolution/improvements.</li> <li>● Support and resource staff and volunteers in their complaint handling roles and responsibilities.</li> <li>● Manage complaints relating to staff and ministry workers</li> </ul> <p><b>Committee</b></p> <ul style="list-style-type: none"> <li>● Receive and disseminate internal complaints external complaints. This includes any complaints that may be about the Senior Pastor</li> <li>● Communicate with complainants.</li> <li>● Assist in identifying and recommending improvements to systems and processes.</li> </ul> | <ul style="list-style-type: none"> <li>● Policy and procedures, email correspondence, meeting minutes, personal development plans.</li> <li>● Policy and procedures, email correspondence, meeting minutes, personal development plans.</li> <li>● Complaints records, correspondence, meeting minutes.</li> </ul> |

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| <ul style="list-style-type: none"> <li>● Report to any governing body where required in collaboration with the Senior Pastor.</li> <li>● Review complaint trends and issues and support recommendations for improvements.</li> <li>● Manage complaints relating to relevant areas of church governance.</li> <li>● Consider and facilitate implementation of improvements to systems and processes.</li> </ul> <p><b>Staff and Elders</b></p> <ul style="list-style-type: none"> <li>● Provide accountability for spiritual conduct to the Senior Pastor.</li> <li>● Ensure people making complaints are listened to, treated with respect, and assisted to make a complaint in line with our policy and procedures.</li> <li>● Manage complaints relating to ministry areas with support from the Committee.</li> <li>● Provide information on complaints, and ways to improve our complaints management system.</li> <li>● Implement changes arising from individual complaints and from analysis of complaint data.</li> </ul> <p><b>All Ministry Workers</b></p> <ul style="list-style-type: none"> <li>● Be aware that we value complaints and have complaint handling policies and procedures.</li> <li>● Direct those wishing to make a complaint to the relevant ministry leader or resources on our website.</li> </ul> | <ul style="list-style-type: none"> <li>● Complaints records, email correspondence, meeting minutes.</li> </ul> |
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Different types of complaints will be managed by different parties. In general:

- The Senior Pastor will receive and manage complaints about employees (temporary, permanent and contractors) and ministry workers.
- The Committee will oversee management of internal and external complaints in consultation with relevant staff and leaders.
- The Committee will oversee complaints relating to church governance. E.g. finances, work health and safety.
- The Committee will manage complaints relating to ministry or events they lead with support and assistance from the staff.
- The Committee will inform the Elders of complaints of spiritual conduct to action handling as appropriate.

## **4. Complaints Management Policy**

We are committed to seeking and receiving feedback and complaints, and dealing with any concerns raised within a reasonable timeframe. Our complaint management system is based on the following principles:

### **Objective and fair**

People making a complaint will be listened to and treated with respect. Every complaint will be addressed in an equitable, objective and unbiased manner. Conflicts of interest will be managed responsibly.

Where a complaint is about a person (staff or volunteer), we will notify the person that a complaint has been made against them, and ensure reasonable opportunity is given to provide information relevant to the complaint. The exception to this may be where external reporting obligations apply.

In making a decision about a complaint, we will consider all relevant information and ensure the decision is supported by evidence. We will provide reason for our decision and any options for redress or review.

We aim to ensure people are not adversely affected as a result of making a complaint.

### **Responsive**

Where possible, complaints will be resolved at first contact with us. Where this is not possible, we will promptly acknowledge receipt of the complaints and inform the person who made the complaint of the complaints process including expected timeframes, their likely involvement in the process, and possible outcomes of their complaint.

We will promptly assess and prioritise complaints according to the urgency of the issues raised. We will advise the person making the complaint of our progress, if we are unable to meet our timeframes and the reason for delay, or if we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed.

### **Accessible and flexible**

We value complaints as an opportunity to identify areas where we could improve. To this end, we aim to make our complaint management process known and accessible. We will include information about how to make a complaint on our website.

We will aim to adopt a flexible complaints handling approach to enhance accessibility for people making complaints and their representatives. Where possible we will aim to accommodate the needs and preferences of the person who made the complaint, and where appropriate, involve them in the resolution process, for example, determining appropriate actions or improvements.

If a complaint involves external agencies, subject to privacy and confidentiality considerations, we will work with other agencies or organisations to ensure communication is clear and coordinated to facilitate an efficient and timely response.

## **Confidential**

We will keep the details of complaints and the fact that they have been made confidential so far as is practical and appropriate. Personal information that identifies individuals will only be disclosed or used by us as permitted under relevant privacy laws, secrecy provisions and confidentiality obligations.

During the investigation, discussion will be limited to those who need to be involved to facilitate complaint resolution and pastoral care of those involved.

### **4.1. Unreasonable Expectations or Conduct**

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. However, when people do not respond or participate reasonably in the process, we will clearly communicate what is acceptable and will then manage the situation to ensure the safety and wellbeing of those involved. We will inform people who make complaints to or about us of internal or external review options available to them.

#### **Accountability and learning**

We will ensure that complaints are recorded so that information can be retrieved for reporting and analysis. We will regularly review complaints to identify trends and inform improvements.

We will provide an analysis of complaints, which will be reported to and reviewed by our Committee annually, and to any governing body on request. We will monitor our complaint management system to ensure effectiveness and identify opportunities for improvement.

## **5. Procedures**

The following information outlines our complaints management approach.

### **5.1. Levels of complaint management**

We aim to resolve complaints at the point they are received where appropriate. Relevant leaders are given appropriate authority, training and supervision to enable this. Where this is not possible, we may decide to escalate the complaint within our organisation for assessment, possible investigation and/or facilitate a resolution.

Where a person making a complaint is dissatisfied with the outcome of our review of their complaint, they may seek an external review of our decision. We will provide information about external review options which may involve the CLC Board of Reference (internal dispute) or the Australian Charities and Not-for-profits Commission (external dispute) or other authority.

## **5.2. Complaint handling steps**

Key stages of our complaint management approach are outlined below:

### **5.2.1. Receive the complaint**

Unless the complaint is readily addressed and resolved at the point it is raised, we will record the complaint including key details such as contact information of the person making the complaint, the date received, issues raised, outcome expected and any additional support the person making a complaint may require. Our Complaint and Feedback form is available for this purpose.

### **5.2.2. Acknowledge the complaint**

We will acknowledge receipt of a complaint promptly, usually within five (5) working days. When appropriate we may offer an explanation or apology. This may be by email, by letter or verbally depending on how the complaint was received, the nature of the complaint, our relationship with the person who made the complaint (e.g. church member or member of the public) and the needs or preferences of the person making the complaint.

### **5.2.3. Assess and investigate**

We will first assess whether the issue raised in the complaint is within our control, and if it is we will decide how it should be managed depending on how significant and/or complicated it is, the effect on the person making the complaint, the risk the issue may pose to others, and whether involvement of other organisations is required. Where appropriate, we will keep the person making the complaint informed of our progress.

### **5.2.4. Determine and communicate outcome**

We will make a decision as to what action is necessary based on all available information and we will document the reasons for our decisions. Where necessary, external and/or professional advice may be sought e.g. advice from other churches, the ACNC, a professional mediator or legal advice. We will contact the person making the complaint and advise them of the outcome of our decisions and the reasons, the resolution we propose or have implemented and options if they are dissatisfied with the outcome.

### **5.2.5. Close the complaint**

We will keep records about how we managed the complaint, the outcome, any outstanding actions, the person responsible and the due date.

## **6. Managing Disputes**

A dispute is an unresolved complaint. This means a person has made a complaint, had that complaint addressed in line with our complaint management procedures but is not satisfied with the outcome of that process.

Our process for managing internal disputes is informed by our church Constitution. If a member indicates they are unhappy with the outcome of our complaints management process and wants further action to be taken, the Committee will notify the Senior Pastor of the need to refer the matter to the Board of Reference. The ACNC does not deal with internal disputes.

Our process for managing external disputes is informed by ACNC standard and expectations. An important part of our communication in finalizing a complaint is to advise the person of the options available to them if they are dissatisfied with the outcome. For external complaints this includes providing the details of the ACNC and information on their website explaining their role in dispute management.

## **7. Policy Distribution Method**

Staff and leaders are advised of policies by email. This policy is available on our website.