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Purpose and Use

This policy sets out the LDF guidelines for handling external complaints.

This policy applies to all internal and external stakeholders of the London Diocesan Fund, including employees, volunteers, contractors and clients.

If your complaint is about anything that falls outside the scope or categories provided below, please contact the relevant part of the organisation, the Archdeacon or General Secretary as appropriate.

This Complaints Policy does not cover complaints or concerns relating to:

- Local church matters and employed members of PCCs, where the complaint should be referred to the PCC
- St Paul's Cathedral, which should be referred to the Cathedral Chapter
- Westminster Abbey, which should be referred to the Abbey Chapter
- Complaints regarding members of clergy. These are subject to a separate complaints procedure, the Clergy Discipline Measure (CDM). Further details can be found on the Diocese of London website (<https://www.london.anglican.org/kb/complaints-process/>)
- Complaints from members of Clergy where the issue is a concern relating to the exercise of the office held. The Archbishops' Council has set out a Code of Practice and supportive advice for dealing with such concerns
- Safeguarding disclosures, concerns, or allegations about abuse of children or vulnerable adults, which should always be referred directly to the police or Social Services where there is immediate danger and otherwise to the Diocesan Safeguarding Adviser. (<https://www.london.anglican.org/church-and-parish-support/safeguarding/>)
- London Diocesan church schools, where the individual school's complaints process should be applied

- London Diocesan Board for Schools, where the LDBS complaint process should be applied.

1. Introduction

The London Diocesan Fund (LDF) takes all received complaints seriously. Complaints can often be an opportunity to put things right and to correct, apologise or explain what has happened. Each one is an opportunity to learn and improve for the future. The purpose of this policy is to:

- Provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint
- Ensure all LDF team members know what to do if a complaint is received
- Ensure all complaints are investigated fairly and in a timely way
- Ensure that complaints are, wherever possible, resolved and that relationships are repaired, and reconciliation explored
- Gather information which can allow the LDF to improve workplace practices

2. Scope

A complaint is any expression of dissatisfaction about any aspect of the LDF. Complaints may come from:

- People who are dissatisfied with the service that they have received from a member of staff (those employed by the LDF)
- People who have concerns relating to policies concerning the LDF, or decisions taken by the directors

Depending on the nature of the complaint and the information provided, the LDF will investigate as far as possible.

3. Receiving Complaints

A complaint can be received verbally or in writing, by email or letter. If we receive a complaint verbally, the person making the complaint will be asked to follow up with a written submission if it is to be considered under the formal process.

The LDF may not be able to investigate an anonymous complaint. To ensure a thorough investigation can be carried out and an appropriate outcome is reached, we encourage people to confirm their identity and contact details.

If a complaint is received by telephone or in person, it must be documented. The member of staff or volunteer who receives a verbal complaint should:

- Record the essential facts of the complaint including the details of any specific people involved in the complaint
- Record the name, address, telephone number and email contact of the person making the complaint
- Record the relationship of the person to the LDF
- Direct the person to the LDF Complaints Policy
- Outline next steps of the complaints process to the person
- Where appropriate, ask the person to send a written account by email so that the complaint is recorded in their own words

This written summary of the verbal complaint should then be emailed to humanresources@london.anglican.org. The HR Team will receive this reply and ensure that where possible, the person making the complaint is contacted.

Written complaints may be sent by letter to the General Secretary, 36 Causton Street, London, SW1P 4AU, or by email to pa.generalsecretary@london.anglican.org. The complaint will then be triaged to the relevant senior leader to investigate and action as appropriate.

If the complaint is about the General Secretary, it may be sent to the Director of People, 36 Causton Street, London, SW1P 4AU, or by email to humanresources@london.anglican.org.

A record of all received complaints will be kept by the HR Directorate regardless of their outcome.

4. Informal Resolution

In many cases, a complaint is best resolved by the person responsible for the issue being complained about. They may be able to resolve it swiftly and should do so if possible and appropriate. Most matters can and should be resolved informally and locally.

If you are dissatisfied with the service provided by the LDF and if you feel able, in the first instance you should raise your complaint and engage with the LDF contact most relevant to the matter of your concern. They should be willing to listen, to discuss the matter, and seek resolution where justified.

As part of the informal procedure, if you remain unhappy, you can request the engaged member of staff to escalate the matter of concern with a more senior member of staff.

If, following the informal process, you are dissatisfied or if the informal route is inappropriate, then the formal procedure should be followed.

Formal Resolution

If the matter is unable to be resolved informally, or if an informal resolution is not appropriate, a formal complaints process may start.

At this stage, your complaint will be passed to the General Secretary who will triage it to the relevant Director (or their delegated authority) for investigation. In these circumstances the following process will be followed:

1. The complaint will be acknowledged within 10 working days, confirming who is dealing with the matter and when you can expect a formal reply. You will also be provided with a copy of the LDF Complaints Policy
2. The facts of your complaint will be investigated, which may require appointment of an additional, independent person. This will involve reviewing any previous case notes and speaking with those who may have been involved in dealing with the complaint at the informal stage
3. If the complaint relates to a specific person, that person will be informed and given an opportunity to respond
4. The person who dealt with the original complaint will be kept informed of what is happening, where appropriate
5. You will receive a definitive reply within 28 working days. If this is not possible because, for example, an investigation has not been fully completed, a progress report will be sent to you with an indication of when a full reply will be given
6. Whether the complaint is upheld or not, you will receive a reply summarising the action taken to investigate the complaint, the conclusions from the investigation, and action taken as a result of the complaint. If formal action is deemed appropriate against a member of staff, no details will be disclosed.

In some instances, we may take the position that the matter cannot be resolved to your satisfaction. However, the aim should be to ensure the process respects those involved and highlights any opportunity for future improvement.

The decision taken at this stage is final, unless the LDF decides it is appropriate to seek external assistance with resolution. A record of all received complaints will be kept by the HR Directorate regardless of their outcome.

5. Complaints and Safeguarding

Safeguarding disclosures, concerns, or allegations about abuse of children or vulnerable adults, which should always be referred directly to the police or Social Services where there is immediate danger and otherwise to the Diocesan Safeguarding Adviser.

Complaints about safeguarding procedures and processes can be processed through this policy. For further information, please refer to the Diocese of London Safeguarding Policy located on the Diocese of London webpages: (<https://www.london.anglican.org/church-and-parish-support/safeguarding/>)

6. Complaints involving serious reputational risk

In some cases, an incident may result a complaint which raises serious reputational damage to the Church of England, London Diocesan Fund or individual engaged by of the LDF or CoE.

In such cases, the complaint must be escalated to the General Secretary to triage and delegate to the relevant Director to manage, in consultation with the Communications team. All relevant parties must be notified as appropriate to help mitigate the risk.

7. Delayed and Unreasonable Complaints

Investigation of a complaint may be terminated for the following reasons:

- If the complaint relates to an incident or event which occurred more than six months before the complaint is made or where the complaint relates to a series of incidents or events, more than six months after the date of the latest incident or complaint
- The complaint is judged by the Director (or their delegated authority) unreasonable, vexatious, frivolous, or a repeat of a previously received and resolved complaint

In these circumstances, the person making the complaint will be notified in writing of the termination of investigation within 10 working days of the complaint being received.

If the person making the complaint is dissatisfied with the decision not to investigate, they may write to or email the General Secretary asking for the decision to be reviewed.

The General Secretary will request a senior member of staff not previously involved, to review the complaint and the decision made. If they conclude the complaint should be investigated, they will nominate a previously unconnected person to respond to the complaint which will then follow the formal procedure. If the conclusion is that the decision to terminate the complaint is reasonable, that decision will stand.

If the General Secretary determines that unreasonable complaints are being submitted by the same person or group of people, they will be advised to desist from such complaints on the grounds of unreasonable behaviour. If an unreasonable level of contact and complaints continues, causing significant levels of disruption and allocation of resources, specific methods of communication, including limitations on the number of future contacts, may be outlined. This will usually be reviewed after 6 months.

In response to any serious incident of aggression or violence, the concerns and actions taken will be put in writing immediately and the police informed.

8. External Escalation

If you feel that your complaint has not been satisfactorily resolved, and the issues of concern pose a risk of significant harm to beneficiaries, assets, or reputation of the Diocese of London or the London Diocesan Fund, you may refer the complaint to the Charity Commission.

Information about the kind of complaints the Commission can involve itself in can be found on their website at: www.charitycommission.gov.uk/publications/cc47.aspx.

9. Related Policies

9.1. Whistleblowing

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. For example, this may be an officer of the diocese or an employee of the London Diocesan Fund potentially breaking the law or proposing to act illegally, dishonestly in any way, or otherwise seeking to cover up wrongdoing.

Such matters should be reported to the General Secretary or the Director of HR and will be dealt with under the Diocesan Whistleblowing Policy.

9.2. Bullying and harassment

Colleagues who believe that they have been discriminated against for any reason and feel that it amounts to bullying and harassment, should access the LDF Dignity at Work Policy for bullying and harassment.

9.3. Grievances

If an LDF employee is concerned about a breach of their own contract of employment, they should access the LDF Grievance Procedure.

Further information relating to this can be located on the LDF Intranet.

10. Variation of Policy

The LDF reserves the right to vary the application of this policy. Reasons to vary may include a conflict of interest.

11. Monitoring Complaints

The number, nature, and outcome of complaints will be reported once a year to the Senior Staff so that any trends or further actions deemed necessary can be considered.

12. Equality, Diversity, and Inclusion

All matters relating to complaints must be handled in a manner that upholds the LDF Equality, Diversity, and Inclusion policy.

To ensure fair and safe practice is upheld, all complaints potentially relating to actual or perceived protected attributes must be escalated to the Human Resources Department for further support and guidance.

For further information, please refer to the LDF Equality, Diversity, and Inclusion Policy located on the LDF Intranet.

13. Data Protection

When managing all matters relating to complaints, the LDF processes personal data collected in accordance with its data protection/processing special categories of personal data policies.

Data collected relating to complaints is held securely and accessed by, and disclosed to, individuals only for the purposes of managing the investigation.

Inappropriate access or disclosure of data constitutes a data breach and must be reported in accordance with the Dioceses' data protection policy immediately. A data breach may warrant disciplinary action which will be managed in accordance with the LDF Disciplinary Policy and Procedure.

14. Version Control Information

Version	Issue date	Nature of amendment	Developed by	Approved by
1	1.7.2023	New policy	HR	SMG
2	11.11.2024	Updated content	HR	HR
2.1	21-11-2024	Updated weblinks	HR	HR