

COMPLAINTS POLICY AND PROCEDURE (the “Policy”)

- 1 The Independent Safeguarding Board (ISB) must act with integrity and maintain the trust and confidence of all those affected by safeguarding activity in the Church of England and the wider community. The ISB expects that all its work is conducted in a way which demonstrates the independence, inclusivity, and integrity of the Board.
- 2 If we make a mistake, we want the chance to put things right for the people or organisations involved. The Policy sets out how someone can let us know when they think something has gone wrong and what steps we will take to address their concerns.

Complaints

- 3 For the purposes of the Policy, a complaint is an issue which amounts to a substantive breach of the ISB’s Operating Principles and Standing Orders, for example:
 - 3.1 we have strayed outside our Terms of Reference applicable at the relevant time.
 - 3.2 in relation to a specific action we have taken (or not taken).
 - 3.3 the behaviour of someone working on our behalf has fallen below the standards expected
- 4 Complaints may come from any individual or organisation connected with a specific matter we are handling. This includes survivors, members of the public, and Church clergy or staff.

Scope and limits

- 5 This Policy relates specifically to the work of the ISB as described in our published Terms of Reference. Everyone who works on behalf of the ISB should be familiar with this document and support the delivery of the complaints process should a complaint occur.
- 6 The Policy does not cover:
 - 6.1 Complaints about a Diocese, Cathedral, Religious Community, or other Church body (including Parochial Church Councils, diocesan bodies, cathedrals, and theological training institutions).
 - 6.2 Complaints concerning officeholding clergy including bishops.
 - 6.3 Complaints about the Church of England National Safeguarding Team’s handling of safeguarding cases, which can be referred to the ISB through a separate process.
 - 6.4 Complaints from anyone working on our behalf, who should use relevant internal procedures.

Our Commitments

- 7 We will:
 - 7.1 provide a fair, open, and accessible complaints procedure which is clear and easy to use.

- 7.2 ensure all complainants are treated seriously with courtesy and respect.
- 7.3 ensure anyone who is the subject of a complaint, or who is involved in its receipt or investigation, is treated fairly with dignity and respect. This includes anyone who is mentioned in a complaint, who may have relevant information which supports any investigation.
- 7.4 ensure that complaints are dealt with as quickly as possible and responded to appropriately.
- 7.5 ensure staff are appropriately trained to use our complaints procedure.
- 7.6 gather information from any relevant source which helps us to improve what we do.

Confidentiality

- 8 Complaints will be handled sensitively and confidentially. Personal data will be processed in accordance with data protection requirements and in accordance with our Privacy Notice.
- 9 We ask that all parties to a complaint to co-operate in keeping complaints confidential whilst the handling of the complaint is in progress. A party may on occasion be required to confirm the fact that a complaint has been made and to provide limited details where there is a legitimate reason for doing so.

Help, support, and accessibility

- 10 We recognise that some individuals may have additional needs (such as physical or sensory impairment) and require additional support or reasonable adjustment to make a complaint (e.g. via friends or other representatives, or the format of investigation meetings or documentation).
- 11 Where possible we will help a person making a complaint to identify a suitable person to guide them through the process and will provide alternative ways of engaging with the process or providing documents in specific formats. This additional support cannot though be a legal representative or advocate who acts directly on their behalf.
- 12 Help and support will also be offered to any member of the ISB or staff subject to a complaint through normal internal channels.

Recording complaint meetings

- 13 We want to make sure that any complaint is investigated in line with this Policy, and this may mean arranging face to face or virtual meetings with those involved. We expect notes to be taken of these meetings and distributed to all attendees. We may engage an independent note-taker.
- 14 It is not our usual practice to record (audio and/or video) complaints meetings. On occasion, we may record (audio and/or video) of a meeting held remotely as a reasonable adjustment for an individual.

- 15 Where recording a meeting is agreed, we will arrange for this to happen and will share the recording. Information shared relating to third parties during the meeting, and therefore recorded, may be disclosable under data protection laws.
- 16 If an individual wants a meeting to be recorded, but the other parties involved do not agree, no recording will take place. Covert recording of meetings is not acceptable under any circumstances.

Complaints Procedure

- 17 All complaints should be made in writing, preferably by email, and addressed to contact@independent-safeguarding.org
- 18 The complaint should be sufficiently detailed to allow for preliminary consideration and investigation, covering:
 - 18.1 What the complaint is about (e.g. a specific incident, experience, or decision)
 - 18.2 Whether the complaint has been considered before
 - 18.3 Who is involved
 - 18.4 What the impact is on the complainant
 - 18.5 What outcome you would like to see from the complaint
- 19 If you do not provide enough information, we may ask you for more detail. If you do not provide more detail as requested, we may not be able to progress your complaint.
- 20 If the complaint relates to a specific person, they have the right to be told of the complaint and to present their response.
- 21 It may be appropriate to contact any third parties if they have information relevant to the complaint. We will make the decision as to whether third parties should be contacted and information shared for the purposes of progressing the complaint under this Policy.
- 22 Stage One – Review of Complaint
 - 22.1 We will consider the nature of the complaint and decide whether it falls within the remit of this Policy. We will notify you of our decision within 14 days:
 - 22.2 If we decide that the complaint does not fall within the remit of this Policy, and will not be considered further by us, we will give our reasons in writing.
 - 22.3 If we decide that the complaint does fall within the remit of this policy, we will move the complaint to Stage Two.
- 23 Stage Two - Informal resolution

- 23.1 In many cases, a concern is most easily resolved by raising it with the person against whom the complaint is made. It may be those involved can work together to find a resolution.
- 23.2 We will decide if the complaint can be progressed under Stage Two.
- 23.3 If it is not possible or appropriate to raise a concern directly with the responsible individual a formal complaints process is available.

24 Stage Three – Formal Complaints

- 24.1 If you wish to move your complaint to Stage Three you should notify us in writing within five working days.
 - 24.2 At Stage Three, we will consider the appointment of an appropriate Investigating Officer. The Investigating Officer may be a member of the ISB or an external individual or organisation.
- 25 We will decide who is best placed to fulfil this role on a complaint-by-complaint basis and will consider the complexity and type of complaint. A simply request from a party to a complaint is not sufficient reason to appoint a specific Investigating Officer.
- 25.1 If we agree that a complaint is to move to Stage Three, we will confirm this to you in writing within five working days of referral to Stage Three. We will confirm with the complainant the timescales for dealing with this stage of the complaint and how they want to be contacted.
 - 25.2 The Investigating Officer will start their investigation, providing a report to the ISB within 20 working days of their appointment. The Investigating Officer may require discussions with those involved in the complaint, including any third parties.
 - 25.3 On receipt of the investigation report, the ISB will write to the complainant with the outcome, within 10 working days. This concludes the final stage of the complaints procedure.
 - 25.4 The above deadlines can be extended where there is a clear justifiable reason, which is shared with the complainant along with a revised timescale for completion. If an investigating officer is appointed from outside the ISB then it is reasonable to assume that some adjustment to the timescales above would apply.

Conclusion of the process

- 26 Stage Three is the last step of the complaints process. Once a case has been considered under this stage, it should be closed. If further correspondence is received that seeks to reopen the matter (from any party) it will be acknowledged, but no further action will be taken.