



Guidance for Cathedrals

Complaints

Purpose of this guidance and template policy

The Charity Commission makes it clear¹ that it is the trustees of a charity who are responsible for the running of their charity and so it is fair and appropriate that concerns are raised with the charity before they are raised with the Charity Commission. This gives the trustees the opportunity to explain misunderstandings or to put things right if something has gone wrong.

A clear and publicly available complaints policy, which sets out the processes for making a complaint to the cathedral, will enable those in the cathedral community and members of the public to raise any complaints with the cathedral directly, so that they can be resolved quickly and any lessons learned by the cathedral can be implemented.

What should you consider when designing an effective complaints policy?

1. Accessibility

Your complaints policy should be easily accessible to members of the public and of the cathedral community and so should be placed in a clearly visible place on the cathedral's website.

2. Clarity and simplicity

Complaints policies should be clear and easy to follow. Your policy should explain the nature and scope of complaints that the cathedral can investigate.

3. Explain how to make a complaint and what will happen if a complaint is made

Your policy should explain how to make a complaint and what the cathedral will do in the event that a complaint is received. Your policy should also explain what the expected timescales are for acknowledging and investigating a complaint.

4. Explain how complaints will be investigated and when and how decisions will be communicated to the complainant

Your policy should outline the process for investigating complaints thoroughly and fairly and the anticipated timescales within which a decision will be made.

5. Explain what to expect from the outcome of the investigation

Your policy should explain how the cathedral will communicate the outcome of an investigation into the complaint to the complainant.

¹ [Complaints about charities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/complaints-about-charities)

6. Explain what a complainant can do if they are not happy with the way their complaint has been dealt with

Your policy should explain if there are provisions for internal escalation or review. It should also note that complainants can escalate certain complaints to the Church Commissioners or to the Charity Commission.

Learning from complaints

Complaints should be regarded as a source of learning and improvement. The Senior Management Group should regularly review the complaints received by the cathedral and their outcomes, to identify any trends or wider learning.

Reporting to the Chapter

The [Administrator²] should report to the Chapter at agreed intervals on the number and general nature of complaints received and the outcome of those complaints, including whether they have led to a change in services, policies or procedures.

The [Administrator³] should keep a secure record of the complaints received, the outcomes of the investigations and the reasons for decisions made, in accordance with the Chapter's document retention policy.

² Or person undertaking the COO role with a different title.

³ Or person undertaking the COO role with a different title.

TEMPLATE POLICY FOR CATHEDRALS

[Name of cathedral] COMPLAINTS POLICY

1. Purpose of this policy

- 1.1 The highest standards of conduct and behaviour are expected from all Chapter members, staff, volunteers and members of any cathedral committees [and advisory councils]. We know there may be times when we do not meet our own high standards. Should this happen we want to hear about it, deal with the situation as quickly as possible and put measures in place to stop it happening again.
- 1.2 The Chapter views complaints as an opportunity to learn and improve for the future, as well as a chance to put things right for the person or the organisation making the complaint.

2. Making this policy publicly available

This policy must be advertised in a prominent place on the cathedral's website, so members of the public can find it easily should they wish to make a complaint. A hard copy should also be provided to any person on request at the cathedral's office.

3. What is a complaint for the purposes of this policy?

A complaint is an expression of dissatisfaction about any aspect of the cathedral, its operations and its mission and ministry or about an action, or lack of action, by the staff, clergy, Chapter members, members of committees of Chapter [and advisory councils], contractors or volunteers that requires a formal response.

4. What complaints are not included in this policy?

- 4.1 This policy does not relate to:
 - (a) complaints from staff, who should refer to the relevant processes in the [employee handbook⁴];
 - (b) [complaints from volunteers, who should refer to the relevant process in the volunteer handbook⁵]; and
 - (c) complaints relating to safeguarding⁶, which should be referred directly to the Cathedral Safeguarding Adviser at [insert contact details] or to the Diocesan Safeguarding Adviser at [insert contact details].

⁴ If you don't have an employee handbook, refer to the relevant employee processes and procedures.

⁵ If you don't have a volunteer handbook, refer to the relevant employee processes and procedures.

⁶ Insert link to the cathedral's safeguarding policy on its website.

4.2 As a general rule, the cathedral will not respond:

- (a) to complaints that do not relate directly to something that the cathedral has done or been involved in;
- (b) when the complaint has already been responded to and has been reviewed through the process in section 9 below⁷;
- (c) when a complaint has clearly been sent to us and numerous other organisations as part of a bulk mailing or email. In this instance we can choose whether it is necessary for us to reply or not.

5. How to make a complaint

- 5.1 You can contact us in whichever way is most convenient to you and we will respond to you via the same method unless instructed otherwise.
- 5.2 Written complaints should be sent by e-mail or letter to the cathedral's [Administrator⁸] at [insert email address] and [insert address].
- 5.3 Should your complaint be about the [Administrator⁹] then the complaint should be directed in writing to the [Dean¹⁰] at the above address or by email at: [insert address].
- 5.4 Please include your name, address and contact telephone number in your email or letter so that we can get back in touch with you easily. The cathedral cannot respond to complaints made anonymously, but we will investigate anonymous complaints and use the information provided to improve in any way we can.
- 5.5 Where a complaint is incoherent or illegible a staff member will contact the complainant, where possible, to request that the complaint be provided in a legible format or to clarify the complaint. Where a legible or coherent version of the complaint is not provided, the complaint will not be able to be progressed.
- 5.6 Verbal complaints may be made by phone on [insert number] or in person to any of the cathedral's staff at the cathedral.
- 5.7 Complaints received by telephone or in person need to be recorded in writing. The person who receives a phone or in person complaint should:
 - (a) write down the facts of the complaint;
 - (b) take the complainant's name, address and telephone number;
 - (c) note down the relationship of the complainant to the cathedral;
 - (d) tell the complainant that the cathedral has a complaints policy and direct them to it;
 - (e) explain to the complainant what will happen next and how long it will take; and
 - (f) where appropriate, ask the complainant to send in a written account by post or by email so that the complaint is recorded in the complainant's own words.

⁷ See section 10 of this policy.

⁸ Or person undertaking the COO role with a different title.

⁹ Or person undertaking the COO role with a different title.

¹⁰ If the Dean is not the appropriate role for this in your cathedral, insert a suitable role title.

6. What we will do when we receive a complaint

- 6.1 We will acknowledge your complaint within 5 working days of receiving it. The acknowledgement will explain who is dealing with your complaint and when you can expect a response.
- 6.2 We will do our best to investigate and respond fully and conclusively to all complaints within twenty working days of a complaint being received. Sometimes a complaint is more complex and so it will take us longer to investigate it. Where this happens, we will send you a progress report and let you know when you can expect to receive a final response.
- 6.3 We will handle any complaints received with sensitivity and in compliance with the Chapter's [data protection policy¹¹], privacy notice¹² and the law.
- 6.4 The Chapter may decide not to respond to a complainant, or to cease to respond to a complainant, where it is considered appropriate and proportionate to do so on the basis that a complainant:
 - (a) is being deliberately abusive, prejudiced or offensive; and/or
 - (b) is harassing a member of staff, volunteer or office holder at the cathedral.

Where the Chapter makes such a decision:

- (c) where possible, the investigation into the complaint made should continue, in accordance with section 7 below; and
- (d) a letter must be sent to the complainant within 5 working days to inform them of the Chapter's decision and it should inform the complainant whether the complaint raised is being investigated by the Chapter.

7. How will complaints be progressed and resolved?

- 7.1 Wherever possible, we will look to resolve your complaint amicably and with pastoral care and sensitivity.
- 7.2 The [Administrator¹³] (or [Dean,¹⁴] as the case may be) will assign a senior employee or a member of the Chapter, as appropriate, to investigate any complaint received (the Investigator). The Investigator must not be someone who is personally involved in the events complained about.
- 7.3 The Investigator will make all necessary and appropriate enquiries to establish the substance of the complaint and note any attempts already made to resolve the matter informally. Where possible, members of staff will be informed of a complaint made about them or any actions for which they were responsible. The Chapter has a duty of care to staff complained about as well as to complainants and so the Investigator should ensure, where possible, that the person about whom a complaint has been made has an opportunity to respond to the concerns raised by the complainant.

¹¹ Amend to reflect the title of your cathedral's policy. Ensure the policy includes provision for how information received as part of a complaint will be used/stored/shared.

¹² Ensure your privacy notice includes provision for how information received as part of a complaint will be used/stored/shared and link to it here.

¹³ Or person undertaking the COO role with a different title.

¹⁴ If the Dean is not the appropriate role for this in your cathedral, insert a suitable role title.

7.4 At the conclusion of the investigation, the Investigator must provide a written report to the [Administrator¹⁵] (or [Dean,¹⁶] as the case may be).

8. How will we inform you about the outcome of your complaint?

8.1 Once the [Administrator¹⁷] (or [Dean¹⁸], as the case may be) receives the Investigator's report, he or she will respond to you in writing (the Outcome Letter).

8.2 If your complaint is upheld in whole or in part, the Outcome Letter will normally include an apology, acknowledge where things have gone wrong and explain whether any actions will be taken as a result of the investigation into your complaint. However, the Outcome Letter will not include personal employment information about any member of staff or any personal information about a Chapter member, committee member or any volunteer.

8.3 The Outcome Letter will also include information on how you can seek a review if you are unhappy with how your complaint has been investigated or handled by the cathedral.

9. What if you are unhappy with how your complaint has been investigated or handled by the cathedral?

9.1 If, after receiving the Outcome Letter, you are unhappy with how your complaint has been investigated or handled by the cathedral, you can refer your complaint for review in accordance with the process and timescales set out in the Outcome Letter.

9.2 If you request a review within the timescales set out in your Outcome Letter, the [Administrator¹⁹] (or [Dean,²⁰] as the case may be) will appoint an independent Chapter member or fellow member of the senior staff team (as appropriate) who has not been involved in the first stage (the Reviewer) to conduct a review. The Reviewer will consider any paperwork relating to the complaint and its investigation, as well as the Investigator's report and the Outcome Letter and consider whether your complaint has been properly investigated and handled by the cathedral. The Reviewer will provide a written report to the [Administrator²¹] (or Dean, as the case may be) and a Review Outcome Letter will be sent to you. Reviews will normally take up to 28 days to complete.

10. What if you are still not happy with how your complaint has been investigated or handled by the cathedral following a Review?

10.1 We hope we are able to resolve your complaint in an honest, open and satisfactory way. However, if you are still unhappy then you can write, either by letter or email, to either of our regulators:

(a) The Church Commissioners at: cathedralregulation@churchofengland.org

¹⁵ Or person undertaking the COO role with a different title.

¹⁶ If the Dean is not the appropriate role for this in your cathedral, insert a suitable role title.

¹⁷ Or person undertaking the COO role with a different title.

¹⁸ If the Dean is not the appropriate role for this in your cathedral, insert a suitable role title.

¹⁹ Or person undertaking the COO role with a different title.

²⁰ If the Dean is not the appropriate role for this in your cathedral, insert a suitable role title.

²¹ Or person undertaking the COO role with a different title.

Please name the cathedral, outline the details of the complaint and explain why you have not been satisfied with our response.

- (b) The Charity Commission at:

The Charity Commission

PO Box 211

Bootle

L20 7YX

<https://www.gov.uk/government/organisations/charity-commission>

- 10.2 Before you write to the Charity Commission, you should check your complaint is one which the Charity Commission will look into²². As stated in the Charity Commission's guidance on complaints about charities, its involvement in relation to complaints about a charity is limited to issues that pose a serious risk of significant harm to that charity's beneficiaries, assets, services or reputation.

11. Monitoring and learning from complaints

- 11.1 The [Senior Management Group] should regularly review the complaints received by the cathedral and their outcomes, to identify any trends or wider learning.
- 11.2 The [Administrator²³] should report to the Chapter at each meeting after any complaints have been received on the number and nature of any complaints received and the outcome of those complaints, including whether they have led to a change in services, policies or procedures. If a complaint raises serious concerns, the [Administrator²⁴] should bring it to the Chapter's attention (or to the Dean and/or the Senior Non-Executive Member's attention, as appropriate) without delay.
- 11.3 The [Administrator²⁵] must keep a secure record of the complaints received, the report of the Investigator setting out the reasons for their decisions and copies of Outcome Letters.

12. Records of your complaint

We will retain a record of your complaint for [6 years after the last contact with you about the complaint. We will then destroy all records of the complaint securely²⁶]. You can read more about how we look after your records and your rights as a data subject in our Privacy Notice, which is available [on our website].

13. Policy review

This policy should be reviewed every three years and updated as required.

Date adopted by Chapter:

²² [Complaints about charities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/organisations/charity-commission)

²³ Or person undertaking the COO role with a different title.

²⁴ Or person undertaking the COO role with a different title.

²⁵ Or person undertaking the COO role with a different title.

²⁶ Ensure this reflects you document retention policy etc.